



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN, JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

May 4, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

Dfeh Number: [REDACTED]

[REDACTED] C&C Property Management et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via email. If you do not approve of the language on the complaint, DO NOT sign it; instead, contact me at the number listed below to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Neha Singh

Neha Singh

Associated Government Program Analyst

510-789-1034

neha.singh@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

C&C Property Management

ADDRESS

855 Pacific Street
Monterey, CA 93940

PHONE

(831) 372-1964

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

8

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

May 3, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From May 31, 2017 to current, I was denied a reasonable accommodation/interactive process while residing in my one-bedroom unit located at [REDACTED]. The subject property is owned by [REDACTED] and managed by C&C Property Management Company and its employee [REDACTED]. The subject property has 6-8 units. My rental amount is \$1,475.00.

I believe I was denied a reasonable accommodation due to my disability (physical).

From May 31, 2017 to current, I made a reasonable accommodation request every month to C&C Property Management to add screen to my window because the dust that comes into my unit from window affected my disability. Respondent, [REDACTED] denied my reasonable accommodation request and stated that the owner said it was not a necessary repair and therefore, not required, which exacerbated my disability. In addition, Respondents failed to engage in an interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

March 15, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation; Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On March 15, 2018, I was served with a retaliatory eviction for engaging in a protected activity (requested a reasonable accommodation and filing this complaint).

From March 2017 to current, I made a reasonable accommodation request to have a screen put on my window because the dust affected my disability. In addition, on November 15, 2017, I filed a complaint with the Department of Fair Employment and Housing against the Respondents and provided a copy of the allegations to [REDACTED]. On March 15, 2018, I was served with a retaliatory eviction and I am being required to move out on May 21, 2018.

This is a violation Government Code, Section 12955, Subdivision (f) and Civil Code 51.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

May 14, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(600) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 25, 2018

Via Email: [REDACTED]

[REDACTED]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Kalpro Corp. et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please follow the Adobe EchoSign instructions to sign and return the complaint via email. If you do not approve of the language on the complaint, **do not sign it**; instead, contact me immediately at my direct telephone number or email address listed below my signature to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Adele Cox

Adele Cox
Associated Governmental Program Analyst
(510) 789-1060
adele.cox@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Kalpro Corp.

ADDRESS

36616 Tierra Subida Avenue
Palmdale, CA 93551

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for Service for
Kalpro Corp.

ADDRESS

36616 Tierra Subida Avenue
Palmdale, CA 93551

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

12

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

September 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

Requested or used a disability-related accommodation

AS A RESULT, I WAS

Subjected to a rental increase and different lease terms

PARTICULARS

On or about September 1, 2017, I was retaliated against while residing in my 1-bedroom apartment located at the subject property of where the violation occurred. The owner is Kalpro Corp. The individual owner is [REDACTED] and the property manager is [REDACTED]. My rent is \$1393.

On or about June or July 2017, the owner, [REDACTED] was notified that I obtained an emotional support animal (ESA) due to my disability. On or about July 24, 2017, I attempted to renew my yearly lease, however, on or around August 2017 or September 2017, I received a letter stating my lease was converted to month-to-month and I was subjected to a 3% rent increase. I believe this was in retaliation for obtaining an ESA.

This is a violation of Government Code 12955, Subdivision (f)

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

December 9, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability

PARTICULARS

On December 2, 2017, and December 9, 2017, I was denied a reasonable accommodation/interactive process based on my disability (mental).

On or about November 2017, I notified the owner, [REDACTED] that I needed the laundry room hours extended as a reasonable accommodation due to my disability. On or around December 2, 2017, I received a letter from [REDACTED] denying my reasonable accommodation. On or around December 2017, I notified [REDACTED] that he was discriminating against me by not extending the laundry room hours based on my disability. On December 9, 2017, I received another letter from [REDACTED] denying my reasonable accommodation request yet again. The denial exacerbated my disability and [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code 12955, Subdivision (a).

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

December 20, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Harassment

PARTICULARS



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

On December 6, 2017 and on December 20, 2017, I was subjected to visual harassment in retaliation for making a reasonable accommodation request.

On December 6, 2017 and on December 20, 2017, after being denied a reasonable accommodation request to extend the laundry hours, the property manager [REDACTED] subjected me to visual harassment by following me and taking pictures of me when I used the laundry room, which created a hostile living environment.

This is a violation of Government Code 12955, Subdivision (f).

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

Jan 25, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfefh.ca.gov

May 7, 2018

Via Email: [REDACTED]

[REDACTED]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please follow the Adobe EchoSign instructions to sign and return the complaint via email. If you do not approve of the language on the complaint, do not sign it; instead, contact me immediately at my direct telephone number or email address listed below my signature to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Adele Cox

Adele Cox
Associated Governmental Program Analyst
(510) 789-1060
adele.cox@dfefh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

6



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

October 6, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From on or about September 1, 2016 to October 6, 2017, I was denied reasonable accommodation/interactive process while residing in my two-bedroom unit located at the address where the violation occurred. The subject property is owned and managed by [REDACTED]. The subject property has 12 units. My rental amount is \$1667.

I believe I was denied a reasonable accommodation due to my disability (physical).

From on or about September 1, 2016 to October 6, 2017 I requested to have trash cans placed near my unit because my disability restricts the weight and height of items I can lift, and prevents me from using the dumpster for my trash. In addition, I have requested to have the sliding patio doors in my unit adjusted to reduce the amount of force needed to open/close them. I was told by [REDACTED] that he will not accommodate my disability, and I should go find a place that does. These denials exacerbated my disability. In addition, [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

October 6, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

PARTICULARS

From on or about October 2016 to October 6, 2017, I was subjected to harassment while residing at the subject property by the owner, [REDACTED].

I believe I was subjected to harassment due to my disability (physical).

From on or around October 2016 to October 6, 2017, [REDACTED] repeatedly demanded that I move or break up heavy furniture and put into the dumpster as a way to harass me because if I did not do it, he would evict me. [REDACTED] is well aware of my weight and height restrictions as this was shared with him from October 2016 to October 6, 2017. This harassment created a hostile living environment.

This is a violation of Government Code Section 12955, Subdivision (a).

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

October 6, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

From on or about October 2016 to October 6, 2017, I was subjected to differential treatment while residing at the subject property.

I believe I was subjected to differential treatment due to my disability (physical).

From October 2016 to October 6, 2017, Respondent, [REDACTED] would not allow me to operate a business from my unit, however, I am aware of a non-disabled tenant who was allowed to operate a business from her unit.

In addition, my guests and customers were not allowed to park at the subject property, however, I am aware of non-disabled tenants who were allowed to have their guests or customers park at the subject property.

This is a violation Government Code, Section 12955, Subdivision (a) and Civil Code 51.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

May 16, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfefh.ca.gov

March 20, 2018

Via Email: [REDACTED]

[REDACTED]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] FPI Management, Inc. et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please follow the Adobe EchoSign instructions to sign and return the complaint via email. If you do not approve of the language on the complaint, do not sign it; instead, contact me immediately at my direct telephone number or email address listed below my signature to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Adele Cox

Adele Cox
Associated Governmental Program Analyst
(510) 789-1060
adele.cox@dfefh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

FPI Management, Inc.

ADDRESS

800 Iron Point Rd.,
Folsom, CA 95630

PHONE

(916) 357-5300

Seasons Apartments, LP

369 San Miguel Dr., [REDACTED]
Newport Beach, CA 92660

9167144400

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

Paracorp Incorporated, Agent for
Service for Seasons Apartments, LP

ADDRESS

2804 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

PHONE

Mike Watembach, Agent for Service
for FPI Management, Inc.800 IRON POINT ROAD
FOLSOM, CA 95630

9163575312

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

220



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

August 25, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From July 2016 to current, my requests for reasonable accommodations were denied and/or delayed and I was denied an interactive process while residing at my 1-bedroom unit located at the address where the violation occurred. The monthly rent is \$658. There are 220 units. The property is owned by Seasons at Laguna Ridge, and managed by FPI Management Inc. The person who denied and/or delayed my reasonable accommodation/failed to engage in an interactive process was [REDACTED] a manager for FPI Management Inc.

From July 2016 through September 2017, I requested a reasonable accommodation from manager [REDACTED] via email and letter to have my next door neighbor cease smoking in the unit or on the balcony as her cigarette smoke was infiltrating into my unit through the vents. The smoking continued thus denying my reasonable accommodation. In addition, [REDACTED] failed to engage in an interactive process. Although [REDACTED] moved my next door neighbor on or around October 1, 2017, as an accommodation, the delay to reasonably accommodate me from July 2016 to September 2017 exacerbated my disability.

From September 2017 through current, I requested a reasonable accommodation from managers [REDACTED] and [REDACTED] via email and letter for mold in my HVAC system to be removed and the HVAC system repaired, as the mold severely exacerbated my disability. I have provided supporting medical documentation. Abatement actions taken have been minimal, and my concerns have been ignored.

This is a violation of Government Code Sections 12955, Subdivision (a) and Civil Code 51.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

November 16, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On or around November 16, 2017, I was served with a letter threatening to serve me with a Three-Day Notice to Perform Covenants or Quit that I believe is in retaliation for my request for reasonable accommodation of a smoke-free environment which was requested on or around September 29, 2017.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

Mar 20, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 10, 2018

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]
RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at sack.keophimane@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Sack Keophimane
Associate Governmental Program Analyst
916-585-7078
sack.keophimane@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

House

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

1

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

August 23, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

I responded to an ad listed on Craigslist.org for a rental property priced at \$1500 per month. I left a message for Respondent [REDACTED] to call me back.

On August 23, 2017, Respondent [REDACTED] contacted me over the phone. I told Respondent [REDACTED] that my fiancé and I were interested in renting the house. Respondent [REDACTED] asked about my income. I told him that I was not working but receiving Social Security Disability Insurance (SSDI). Respondent [REDACTED] proceeded to say that disabled people are not reliable with their rent and will not rent to them. Respondent [REDACTED] did not even want to

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

factor my SSDI benefit together with my fiancé's income. I asked Respondent [REDACTED] don't you want to know about me? In reply, Respondent [REDACTED] stated: I do not want to know about you. Why aren't you working? Why can't you work like the rest of society? As a result, Respondent [REDACTED] said I was not a good fit to rent his house. I believe I was discriminated, harassed, and denied rental due to my source of income and disability.

Moreover, I asked Respondent [REDACTED] if he would accept my two dogs as Emotional Support Animals (ESA). I told him that I have documentation for them. Respondent [REDACTED] stated he would charge me a \$500 dollar deposit per dog. I believe Respondent [REDACTED] wanting to charge me a \$500 deposit for each ESA was discriminating due to my disability.

Furthermore, Respondent [REDACTED] asked questions about my disability that was irrelevant and inappropriate. For instance, Respondent [REDACTED] asked me about my weight and height. I believe Respondent [REDACTED] was implying that a disabled person like me must be overweight and sloppy. I could hear one of his friends laughing in the background while Respondent [REDACTED] was asking me these questions. Therefore, I believe I was subjected to discriminatory statements based on my disability.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

August 23, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Sex/Gender

AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory statements/advertisement

PARTICULARS

Further during our phone conversation, Respondent [REDACTED] stated he wanted to do business with the man of the house. I perceive this statement as discrimination against my gender (female) and not wanting to do business with a woman.

As a result, I was discriminated and denied rental due to my sex (female) and disability.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

[REDACTED]

Date:

Jan 11, 2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

PROPERTY TYPE

House

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

August 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory statements/advertisement

PARTICULARS

On or about August 2017, Respondent [REDACTED] made discriminatory statements about my disability, including that I was "psychotic" and that I heard voices.



**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 20, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Gender identity or expression; Race; Sex/Gender; Sexual orientation

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

On or about September 20, 2017, I reported to Respondent [REDACTED] that my roommate was being violent towards me, damaging my property and making discriminatory statements about my sexual orientation. In response to my complaint, Respondent [REDACTED] threatened to give us both a 30-day notice and ultimately allowed my roommate to stay for months without concerns for my safety. I believe Respondent [REDACTED] (who is Filipina) discriminated against me and failed to address my safety concerns because of my disability (mental), Race (African-American), sex and sexual orientation.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

Printed Name

3-1-18

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

COMPLAINANT

ADDRESS

PHONE

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Charities Housing Development
Corporation of Santa Clara County

ADDRESS

1400 Parkmoor Ave., Ste. 190
San Jose, CA 95126

PHONE

(408) 550-8300

AGENT FOR SERVICE

Dan Wu, Agent for Service for
Charities Housing Development
Corporation of Santa Clara County

ADDRESS

1400 Parkmoor Ave., Ste. 190
San Jose, CA 95126

PHONE

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

43

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

January 5, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about January 5, 2017, there was a break in and theft in my apartment that raised concerns for my safety and exacerbated my disability (mental). Therefore, I submitted a reasonable accommodation request to Respondent [REDACTED] asking that I be allowed to install security equipment in my unit. Respondent [REDACTED] immediately denied my reasonable accommodation request and failed to engage in an interactive process.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

August 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

On or about August 2017, Respondent [REDACTED] raised my rent by \$200. I have personal knowledge that Respondent [REDACTED] raised my rent a disproportionate amount in comparison to other tenants on many occasions. I believe the rent increases are in retaliation for filing a discrimination complaint against Respondent [REDACTED] with HUD in 2015.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

[REDACTED]

Date:

3-6-2018

Printed Name

[REDACTED]

January 3, 2018

Via [First Class Mail] [Email]

[REDACTED]

RE: Request to Approve Amended Complaint

DFEH Number: [REDACTED]

HUD Number: [REDACTED]

Dear [REDACTED]

We have amended your complaint based on the changes you requested. Please read the proposed amended complaint carefully. If you do not approve of the language on the complaint, do not sign it; instead, contact me **within ten (10) calendar days** to discuss your concerns. If you agree with the language, please sign and return the amended complaint as soon as possible. We must receive the signed complaint before it can be investigated. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at albert.rodgers@dfeh.ca.gov or by fax to 1-888-519-5917.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,



Albert Rodgers
Staff Services Analyst
(916) 585-7073
Albert.Rodgers@dfeh.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

10

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 9, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Please describe what happened in your own words. You are limited to 5000 characters.

Complainant [REDACTED] is disabled as defined by the federal Fair Housing Act. Respondent is [REDACTED]
[REDACTED] Complainant suffered a fractured hip in late June 2017 that required surgery and has
impaired his ability to leave his apartment for extended periods for the past four months.

On or about September 21, 2017 Complainant received a No Cause 90-Day Notice to Vacate. Respondent verbally informed Complainant the reason was because the Housing Authority was going to perform an inspection of the property and Respondent did not wish to make any required repairs.

File Date: December 6, 2017

Amended

Page 1 of 2

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

HUD NUMBER

[REDACTED]

On October 20, 2017 Complainant submitted a request that the Notice to Vacate be extended until Complainant recovers from his hip surgery and can find replacement housing. Complainant states he does not expect to fully recover for three to four months beyond the date Respondent expects Complainant to move. Complainant also submitted medical verification of the disability and need for the accommodation from a treating physician. On October 27 Complainant received a hand written denial of the accommodation request from Respondent.

On November 8, 2017 Complainant resubmitted the Accommodation Request for extending the time to vacate until he has recovered and is able to secure housing. The letter included a letter from his treating physician stating that the Complainant cannot resume looking for an apartment due to his disability until his expected recovery February 1, 2018. Respondent again denied the request on November 9, 2017.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

[REDACTED]

Jan 4, 2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Franklin Management

ADDRESS

4604 Cahuenga Blvd
Toluca Lake, California 91602

PHONE

(818) 985-4129

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

48



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED
Discrimination

ON OR BEFORE
August 15, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED
Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO
Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about August 15, 2017 I requested a reasonable accommodation from management to fix the elevator and was denied due to my disability. I lived on the 3rd floor and my disability limited my mobility to go up and down the stairs. With the elevator consistently out of order, it was difficult for me to go between floors. As a result of my reasonable accommodation being denied, I was forced to move from the premises.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

4/16/18

RECEIVED

APR 16 2018

Dept. of Fair Employment & Housing
Los Angeles Regional Office



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

August 14, 2017

Sent via Echosign: [REDACTED]

RE: **Request to Approve Complaint**

DFEH Matter Number: [REDACTED]

[REDACTED] California Department of Veterans Affairs

Dear [REDACTED]

This notice confirms that you have filed an inquiry and have been interviewed by a Department of Fair Employment and Housing (DFEH) representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns. **If you do not return the signed complaint within 10 days, your inquiry will be closed and no further action will be taken.**

Please return the signed complaint by mail to DFEH, 2218 Kausen Dr. Suite 100 Elk Grove, CA 95758 or by email to the email address below or by fax to 888-519-5917.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Camilla Asuncion
Staff Services Analyst
(916) 585-7086
camilla.asuncion@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Unruh Civil Rights Act
(Civ. Code, § 51)**

Complaint of

DFEH No. [REDACTED]

[REDACTED] Complainant.
[REDACTED]

vs.

California Department of Veterans Affairs
Respondent.
c/o Veterans Home of California – Lancaster
45221 30th Street West
Lancaster, CA 93536

[REDACTED] - Administrator, As an individual, Co-
Respondent.
c/o The William J. "Pete" Knight Veterans Home of
California
45221 30th Street West
Lancaster, CA 93536

THE PARTICULARS ARE:

1. [REDACTED] alleges that respondent took the following adverse actions against complainant. Complainant was denied full or equal accommodations, advantages, facilities, privileges, or services by a business establishment, including both private and public entities because of one or more Fair Employment and Housing Act (which incorporates Civil Code section 51) protected basis: **Race, Other - [specify] Engagement in protected activity.**

2. My belief is based on the following: I believe I was discriminated and retaliated against at The William J. Pete Knight Veterans Home of California, 45221 30th Street West, [REDACTED] Lancaster, CA 93536. The property is a 60-bed, long-term residential care facility owned and operated by the California Department of Veterans Affairs. The facility is managed in part by [REDACTED] [Administrator].

My belief is based on the following:

a. On or about January 16, 2017, which was the Martin Luther King, Jr. holiday, I was denied food service by the dining services staff [which is predominantly non-African American]. I believe they refused service to me in the dining hall on this day due to my race.

b. On or about January 23 and January 31, 2017, I engaged in a protected activity when I complained of the denial of service due to my race to The William J. Pete Knight Veterans Home of California management, including Administrator [REDACTED] [non-African American].

c. On or about March 28, 2017, the dining services staff retaliated against me by continuing to refuse service to me.

3. Complainant [REDACTED] resides in the City of [REDACTED] State of CA.

VERIFICATION

I, [REDACTED] am the **Complainant** in the above complaint. I have read the above complaint and know its contents. I declare under penalty of perjury under the laws of the State of California that the above is true and correct of my own knowledge, except as to those matters alleged on information and belief, which I also believe to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

Aug 14, 2017

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACTDEEN NUMBER
[REDACTED]

HUD NUMBER

COMPLAINANT(S)
[REDACTED]ADDRESS
[REDACTED]PHONE
[REDACTED]

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW
General - 12955 a

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

ADDRESS

PHONE

BRE Paragon MF Crystal View CA 233 S. Wacker Drive #4200, Chicago, IL
60606-6310

AGENT FOR SERVICE

ADDRESS

PHONE

Lawyers Incorporating Service 222 S. Riverside PLZ #200, Chicago, IL 60606

CO-RESPONDENT(S)

ADDRESS

PHONE

[REDACTED]
c/o Crystal View Apartments

12156 Bayport Street, Garden Grove, CA 92840

(714) 930-2350

[REDACTED]
c/o Crystal View Apartments

12156 Bayport Street, Garden Grove, CA 92840

(714) 930-2350

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEPT. NUMBER

HUD NUMBER

PROPERTY TYPE
Apartment

ADDRESS WHERE VIOLATION OCCURRED

NO. OF UNITS
402

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 10, 2016

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability

AS A RESULT, I WAS

Denied reasonable accommodation, Denied
rental/lease/sale

STATEMENT OF FACTS

I. On or before September 10, 2016, I was subjected to discrimination at the Crystal View Apartment complex located at [REDACTED]. The subject property has 402 units. The owners are BRE Paragon MF Crystal View CA. [REDACTED] LNU are leasing representatives.

II. I believe that I was denied and reasonable accommodation and denied rental based upon my disability (on file with DFEH). This is a violation of Government Code section 12955 [a]. My belief is based upon the following:

a. On or around August 16, 2016, I applied and was approved for a unit. The agreed upon move in date was August 25, 2016.

b. On August 22, 2016, I advised leasing representative [REDACTED] LNU that I needed to delay my move in date to September 15, 2016 due to my disability and being unable to physically move until such time. [REDACTED] referred me to [REDACTED] who denied my request unless I agreed to pay a fee of \$105.00 due to the delay. I refused and was pressured to cancel my contract due to being unable to move at that time due to my disability and the financial strain the imposed fees would cause.

c. On September 10, 2016, I received my full deposit back but only after I consistently argued my case to corporate which exasperated my disability by the financial strain and loss of housing.



STATE OF CALIFORNIA Department of Fair Employment and Housing

HOUSING

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

HLD NUMBER

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

2/13/17

Printed Name:

RECEIVED
2017 FEB 14 AM 8:11
DEPT. OF FAIR EMPLOYMENT
& HOUSING
LOS ANGELES REGIONAL



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

February 12, 2018

Via [First Class Mail] [Email]

[REDACTED]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at shaynah.williams@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Shaynah Williams
Staff Services Analyst
213-337-4497
shaynah.williams@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

2

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 8, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Complainant has requested both in writing and verbally that the owner, [REDACTED] communicate with him via electronic communication rather than through paper notices due to his frequent hospital visits and treatments for his disability. Respondent refuses to accommodate Complainant's request and continues to issue paper notices.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

02/16/2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

September 29, 2017



RE: Notice of Complaint

DFEH Number: [REDACTED]

HUD Number:
[REDACTED]

Dear [REDACTED]

This notice confirms that you have filed a housing inquiry and have been interviewed by a Department of Fair Employment and Housing representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns. **If you do not return the signed complaint within 5 days, your inquiry will be closed and no further action will be taken.**

Please return the signed complaint using the Adobe EchoSign electronic signature. If you need further assistance, please feel free to contact the toll free telephone number at (800) 884-1684 with any questions you may have.

Please note that the information you provided is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Lilian Maher
Consultant II
510-789-1061
lilian.maher@dfeh.ca.gov



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DEEH NUMBER

HUD NUMBER

COMPLAINANT(S)

ADDRESS

PHONE

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW
General - 12955 a

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

ADDRESS

PHONE

AGENT FOR SERVICE

ADDRESS

PHONE

CO-RESPONDENT(S)

ADDRESS

PHONE

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

HUD NUMBER

PROPERTY TYPE
House

ADDRESS WHERE VIOLATION OCCURRED

NO. OF UNITS
2

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

October 01, 2016

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability - [physical or mental]

AS A RESULT, I WAS

Denied reasonable accommodation, Evicted

STATEMENT OF FACTS

I. Between June and August 2016, I was harassed and in August 2016, I was denied reasonable accommodation and threatened with eviction from my room in a house, located at [REDACTED]. There were 2 rental units in the property. At relevant times, the property was owned by [REDACTED]. The property was occupied and managed by the owners.

II. I believe I was harassed, denied reasonable accommodation and evicted because of my disability, which is a violation of Government Code section 12955(a). My belief is based on the following:

a. I lived in the subject property for approximately 4 years before June 2016, when I had a disability-related incident and I disclosed my disability. On or around June 6, 2016, [REDACTED] told me that if I had another episode, I would have to move out. This created a hostile living environment.

b. On or around August 19, 2016, I told [REDACTED] about safety concerns about the subject property. [REDACTED] who was on notice of my disability, laughed at me and told me to deal with it. This exacerbated my disability and created a hostile living environment.

c. In or around August 27, 2016, I became aware of notices terminating my tenancy, which were posted on my door while I was hospitalized subsequent to the August 19, 2016 lock-out. I was forced to move out on October 1, 2016.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

HUD NUMBER

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:
Sep 29, 2017

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Terra Lago Home Owners Association

ADDRESS

Indio, California 92203

PHONE

7603461161

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Associa Property Management

42-635 Melanie Place Ste. 103 Palm
Desert, CA 92211

7603461161

PROPERTY TYPE

House

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

500+



**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER



- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

August 8, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Complainant made an official reasonable modification request supported by a doctor's recommendation, to the Homeowner's Association Design Review Committee on August 8, 2017. Complainant received a letter denying the request on August 10, 2017.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

FEB 21, 2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Quail Run Apartments

[REDACTED]

Riverside Charitable Corporation

ADDRESS

14131 Yorba St.
Tustin, CA 92780

PHONE

444 S Flower St Ste 3100
Los Angeles, CA 90071

AGENT FOR SERVICE

[REDACTED] Agent for Service,
Agent for Service for Quail Run
Apartments[REDACTED] Agent for Service for
Riverside Charitable Corporation

ADDRESS

3200 Douglas Blvd., Suite 200
Roseville, CA 95661

PHONE

9167736060

444 S Flower St Ste 3100
Los Angeles CA 90071

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

104



— **PLANTING** —

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED
Discrimination

ON OR BEFORE
February 1, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED
Disability (physical or mental).

AS A RESULT, I WAS SUBJECTED TO
Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or before February 2018 I made a reasonable accommodation request to move into a first floor unit. [REDACTED] the manager who I made these requests to, was informed via doctor's recommendation and verbally of my disabilities and my need for a first floor apartment. I believe that I have been denied a reasonable accommodation request based on my disabilities.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

5-7-18



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

April 4, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Amended Complaint

Dfeh Number: [REDACTED]

HUD Number: [REDACTED]

[REDACTED] BRE Alameda/MF Property Owner LLC et al.

Dear [REDACTED]

We have amended your complaint based on the changes you requested. Please read the proposed amended complaint carefully. If you do not approve of the language on the complaint, do not sign it; instead, contact me **within ten (10) calendar days** to discuss your concerns. If you agree with the language, please sign and return the amended complaint as soon as possible. We must receive the signed complaint before it can be investigated. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldue@dfeh.ca.gov or by fax to 1-888-519-5917.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,

Mario Anzaldue
Associate Governmental Program Analyst
916-585-8153
mario.anzaldue@dfeh.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)**ADDRESS****PHONE**BRE Alameda/MF Property Owner
LLC222 S Riverside Plaza Suite 2000
Chicago, IL 60606

[REDACTED]

[REDACTED]

[REDACTED]

FPI Management, Inc.

800 Iron Point Rd.
Folsom, CA 95630

(916) 357-5300

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lincoln University Extensions -
Housing401 15th St.
Oakland, CA 94612

(510) 628-8010

KW Alameda, LLC

151 S. El Camino
Beverly Hills, CA 90212

(310) 887-6400

AGENT FOR SERVICE**ADDRESS****PHONE**[REDACTED] Agent for Service
for FPI Management, Inc.800 Iron Point Rd.
Folsom, CA 95630

(916) 357-5312

File Date: March 12, 2018
Amended

Page 1 of 4

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

CSC - Lawyers Incorporating
Services, Agent for Service for BRE
Alameda/MF Property Owner LLC

2710 Gateway Oaks Drive, Suite
150N
Sacramento, CA 95833

[REDACTED] Agent for Service for
Lincoln University Extensions -
Housing

401 15th Street
Oakland, CA 94612

[REDACTED] (C T CORPORATION
SYSTEM), Agent for Service for KW
Alameda, LLC

818 W Seventh Street, Suite 930
Los Angeles, CA 90017

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

[REDACTED]

100

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

- Allegation -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Complainant is [REDACTED] [REDACTED] is a disabled person as defined by the federal Fair Housing Act. Respondents are FPI Management Inc. (property management company), [REDACTED] Senior Vice President of Corporate Operations at FPI Management), [REDACTED] (regional manager), [REDACTED] (onsite manager), and BRE Alameda I MF Property (owner). Summer House Apartments, the subject property, is a 390-unit apartment complex. Complainant was a student at Lincoln University, which provided Complainant housing by renting an apartment at the subject property and subletting it to Complainant and four other students attending Lincoln University.

Complainant lived at the subject property from August 4, 2017 through November 30, 2017. Complainant states that in or around October 2017, he made complaints to [REDACTED] Senior Vice President of Corporate Operations at FPI Management) about "extreme and continuous pounding noise on the ceiling," which "caused severe disturbance and affected [his] attempts to recover from PTSD." Complainant describes the noise as "loud banging or pounding on the ceiling," "as if someone was running or jumping, or dropping heavy objects on the ground." The noise was sporadic and started as early as 4am until 12 noon, and started again around 3pm until 7pm. [REDACTED] responded to Complainant by stating that he relayed this information to [REDACTED] and promised that Complainant's concerns would be addressed. Shortly thereafter, [REDACTED] LNU looked into the issue, but claimed not to have found any noise issues. Respondents did not engage in an interactive process with Complainant.

On October 29, 2017, Complainant contacted the Alameda Police Department and filed a police report. Two police officers investigated the matter and spoke to [REDACTED] LNU. [REDACTED] LNU told the police officers that she acknowledged that the parents living in apartment 310 above Complainant's unit were working on solutions to the noise problem involving their children. After the police report was filed, Complainant states that there was a "dramatic and violent increase in the noise," describing it as "if someone was deliberately slamming something on the floor."

Complainant states that later in November he received two separate notices of lease violations from Respondents due to reports of smoking and noise, which Complainant describes as false and alleges were retaliation for requesting an accommodation. On November 30, 2017, Complainant moved out due to the ongoing issues he was encountering with his housing.



AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

Dfeh NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

Apr 4, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 25, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Community Development Properties et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at sack.keophimane@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Sack Keophimane
Associate Governmental Program Analyst
916-585-7078
sack.keophimane@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

ADDRESS

PHONE

Community Development Properties

1221 2nd Ave., #500
Seattle, WA 98101Community Development Properties:
Risk Management Unit700 W. Main St.
Alhambra, CA 91801

(626) 943-3898

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

ADDRESS

PHONE

CT Corporation System (C0168406),
Agent for Service for Community
Development Properties111 Eight Ave., 13th Floor
New York, NY 10011

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Other

1

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 19, 2016

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

I requested a reasonable accommodation from Respondents [REDACTED] for a two bedroom unit through the Section 8 program. My request for the two bedroom unit included my live-in-aide and medical equipment for my disability. I provided my medical verification from my doctor but Respondents [REDACTED] still denied my request. I believe Respondent [REDACTED] denying my reasonable accommodation request was discrimination based on my disability.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

[REDACTED]

01/25/2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]
[REDACTED]

ADDRESS

[REDACTED]
[REDACTED]

PHONE

[REDACTED]
[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]
[REDACTED]

ADDRESS

[REDACTED]
[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

6



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

May 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about May 1 2017 to current, we were denied a reasonable accommodation/interactive process while residing in our four-bedroom unit located at the address where the violation occurred. The subject property is owned by [REDACTED] and managed by [REDACTED]. The subject property has six units. My rental amount is \$1800.00.

On or about May 1 2017, I made a reasonable accommodation request to [REDACTED] for a disabled parking space. However, to date, [REDACTED] has not responded thus denying the reasonable accommodation request. In addition, [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

3/2/18

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

3/2/18

Housing Discrimination Complaint

Case Number: [REDACTED]

DFEH Matter [REDACTED]

Date Filed: May 9, 2017

1. Complainants:

[REDACTED]

[REDACTED]

2. Complainant Representatives:

3. Other Aggrieved Parties:

[REDACTED]

[REDACTED]

4. The following is alleged to have occurred or is about to occur:

- Discriminatory refusal to rent
- Discriminatory terms, conditions, privileges, or services and facilities
- Discriminatory acts under Section 818 (coercion, Etc.)
- Failure to make reasonable accommodation

5. The alleged violation occurred because of:

- Handicap
- Retaliation

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

[REDACTED]

7. Respondents:

[REDACTED]

8. The following is a brief and concise statement of the facts regarding the alleged violation:

The Complainants are [REDACTED] who is disabled as defined by the federal Fair Housing Act, and her adult son, [REDACTED]. The Respondent is [REDACTED] (Owner).

The Complainants moved to the subject property on 01/13/2016. On 10/13/2016, the Respondent notified Complainant [REDACTED] that pets were not allowed at the subject property as per the terms of her lease, so on 10/19/2016, she submitted a reasonable accommodation request, along with supporting medical documentation, explaining that her two small dogs were not pets her support animals. Complainant [REDACTED] received no response to this request until 11/22/2016, when the Respondent issued a 90-day notice of termination of tenancy, which was followed up by a verbal eviction notice on 12/05/2016, and again on 02/09/2017 with a text message 90-day notice. After contacting a legal aid group, who sent the Respondents two letters regarding the notices of intent to evict, and the appearance that these actions were retaliatory for the exercise of fair housing rights, on 03/06/2017, the Respondent announced a \$125 rent increase, which Complainant [REDACTED] alleges is further retaliation for the exercise of her fair housing rights through the reasonable accommodation request. Finally, Complainant [REDACTED] alleges that since submitting her original reasonable accommodation request on 10/19/2016, the Respondent has refused to fulfill any of her repair requests.

9. The most recent date on which the alleged discrimination occurred:

March 06, 2017, and is continuing.

10. Types of Federal Funding Identified:

- Section 8 Assisted, Tenant Based

11. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:

804a or f, 804b or f, 818, and 804f3B of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



05-01-17

Date

N O T E: HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



5-01-17

Date

N O T E: HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

Housing Discrimination Complaint

Case Number:



DFEH Matter



Date Filed: March 9, 2017

1. Complainants:



2. Complainant Representatives:

3. Other Aggrieved Parties:

4. The following is alleged to have occurred or is about to occur:

- Discriminatory advertising, statements and notices
- Discriminatory refusal to rent
- Discriminatory terms, conditions, privileges, or services and facilities
- Discriminatory acts under Section 818 (coercion, Etc.)

5. The alleged violation occurred because of:

- Handicap
- Retaliation

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):



7. Respondents:



8. The following is a brief and concise statement of the facts regarding the alleged violation:

The Complainant is [REDACTED] who is disabled as defined by the federal Fair Housing Act. The Respondent is [REDACTED] (Owner).

The Complainant resided at the subject property for approx. a year, during which time her rent was paid by the Regional Center of the East Bay, an organization which provides support to individuals with developmental disabilities.

The Complainant alleges that as the Respondent was aware of the Complainant's disability (through the rental arrangement described above), the Respondent took advantage of the Complainant throughout her tenancy. The Complainant alleges that she discovered the studio she rented, which was behind the main house, was illegal, and that she was deprived of heat and often electricity. As the Respondent refused to address this, and in fact blamed the Complainant for the electrical issues, the Complainant was intimidated into moving out, which she did on 12/23/2016, following threats from the Respondent. Following the Complainant's move out, the Respondent has refused to refund her security deposit.

The Complainant also alleges that she was subjected to different terms and conditions during her tenancy, as on at least two occasions the Respondent hosted yard sales, and allowed every resident of the subject property to sell belongings at the yard sale, but forbid the Complainant from doing the same.

Finally, the Complainant alleges that despite the Respondent's awareness of her disability and the impact it played in her inability to work, and despite the fact that rent was always paid in full, the Respondent would regularly criticize the Complainant for not working, telling her that her volunteer efforts were not enough, and beginning in or around the end of 11/2016, the Respondent began telling the Complainant that if she did not get a job she could no longer live there.

9. The most recent date on which the alleged discrimination occurred:

December 23, 2016

10. Types of Federal Funding Identified:

11. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:

804c, 804a or f, 804b or f, and 818 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



2-8-17

Date

N O T E: HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

RECEIVED
MAR -9 PM 1:16
DEPT. OF HOUSING
& DEVELOPMENT
LOS ANGELES REGIONAL



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfefh.ca.gov

January 5, 2018

Via [First Class Mail] [Email]



RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Casa Monterey LTD et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldue@dfefh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldue
Associate Governmental Program Analyst
916-585-8153
mario.anzaldue@dfefh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

[REDACTED]

[REDACTED]

ADDRESS

[REDACTED]

[REDACTED]

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Casa Monterey LTD

ADDRESS

P.O. Box 29890
Anaheim, CA 92809

PHONE

FDC Management, Inc.

135 S. Chaparral Court, Suite 200
Anaheim Hills, California 92808

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for Service for
Casa Monterey LTD

ADDRESS

135 South Chaparral Ct., #200
Anaheim, CA 92808

PHONE

[REDACTED] Agent for
Service, Agent for Service for FDC
Management, Inc.135 S. Chaparral Court, Suite 200
Anaheim Hills, CA 92808

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

[REDACTED]

120

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

August 15, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

I requested a reasonable accommodation many times from Respondent [REDACTED] to put us in a hotel for the day because the fumes that were coming from the unit downstairs which had renovation made it difficult for us to breathe due to our disability. My wife and I have a disability. Respondent [REDACTED] was aware of my disability but still denied my request. On August 23, 2017, I requested another reasonable accommodation for the same matter and Respondent [REDACTED] ignored and denied my request. I believe I was discriminated and denied a reasonable accommodation based on my disability.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

August 13, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On July 13, 2017, I told Respondent [REDACTED] that I was going to file a complaint with the Department of Fair Employment and Housing because I was harassed and discriminated due to my association with a member of a protected class. Respondent [REDACTED] started treating me differently after I told her about this. For example, she became belligerent about everything. She called the police alleging that I threatened [REDACTED] who was the property's groundskeeper. Respondent [REDACTED] threatened to evict me, and ended up serving me with an Unlawful Detainer Notice knowing that I always paid my rent on time. Respondent [REDACTED] has made it difficult for me and my family to enjoy our living environment. As of this time, I am going through a court hearing with her. I believe I was being evicted, retaliated, harassed, and discriminated based on my association with a member of a protected class.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

May 7, 2018

Via Email [REDACTED]

[REDACTED]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Ladera WNG II, LLC, et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at karina.arabolaza@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Karina Arabolaza
Consultant II
213-337-4520
karina.arabolaza@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Ladera WNG II, LLC, c/o Rancho
Mission Viejo

ADDRESS

PO Box 9
San Juan Capistrano, CA 92693-
0009

PHONE

Western National Property
Management8 Executive Circle
Irvine, CA 92614

(949) 862-6200

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

221



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

February 6, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Other: Engagement in a Protected Activity

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

In February 2016, Western National Property Management conducted an inspection of my unit during which management became aware that I had a cat/s. Subsequently, on or around April 2016, I made a reasonable accommodation request to have my cat/s as my emotional support animal. Since then, anytime management conducted an inspection of my unit or whenever management staff changed and my cat/s were singled out, I was required to re-submit my reasonable accommodation request, including medical verification, on the basis that I had used incorrect or out of date forms.

Between January and April 2017, I had to reiterate my reasonable accommodation request for my service animal/s. I also made additional reasonable accommodation requests to have more time to address my storage needs, more time to prepare for inspections and to communicate with me via email. Management denied all of my reasonable accommodation requests.

On or around July 2017, with the assistance of the Orange County Fair Housing Council, I sent a letter to management to cease their harassment of unreasonable inspections and denial of my reasonable accommodation requests. Management simply responded that they would consult with an attorney.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

February 6, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Since April 2017, in retaliation for making reasonable accommodation requests due to my Disability (on file with DFEH) and my engagement in a protected activity, management increased the number of inspections to my unit and garage.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

February 6, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On or around September 2017, in retaliation for making reasonable accommodation requests due to my Disability (on file with DFEH) and my engagement in a protected activity, management issued me a notice of non-renewal and termination of tenancy. The reasons given indicated that I was using my garage as storage space, I had unauthorized animals and that my reasonable accommodation requests were not properly addressed (no clear connection with my disability).

- Allegation 4 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

February 6, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); National Origin (includes language restrictions)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

During my tenancy, I rented from management additional storage space, which I was granted for an additional fee of \$125. I later learned that another resident who was also disabled and Hispanic and I were the only ones charged additional fees for storage space and were subjected to numerous inspections when management changed the terms and conditions of allowing residents to use garage space for storage. Management subjected me to different terms and conditions due to my Disability and my National Origin charging me additional fees and conducting numerous inspections.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 5 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

February 6, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

PARTICULARS

Since July 2017, after I made several reasonable accommodation requests, management increased the number of inspections of my unit and storage space, including my garage. Management, however, denied my reasonable accommodation requests and fully aware that without the accommodations I would not be able to comply with the inspections, intentionally harassed me with numerous inspections.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE: DATE:

[REDACTED]

May 14, 2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

COMPLAINANT(S)

ADDRESS

PHONE

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW

General - 12955 (a), (c) and (f)

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

ADDRESS

PHONE

Oceanside Gardens Limited Partnership

3533 Empleo Street
San Luis Obispo, CA 93401

AGENT FOR SERVICE

ADDRESS

PHONE

c/o Oceanside Gardens Limited Partnership

3533 Empleo Street
San Luis Obispo, CA 93401

CO-RESPONDENT(S)

ADDRESS

PHONE

The Duncan Group

3533 Empleo Street
San Luis Obispo, CA 93401

(805) 781-3088

AGENT FOR SERVICE

ADDRESS

PHONE

c/o The Duncan Group

3533 Empleo Street
San Luis Obispo, CA 93401

CO-RESPONDENT(S)

ADDRESS

PHONE

Property Manager, The Duncan Group

2612 Elm Ave.
Morro Bay, CA 93442

(805) 772-9759

CO-RESPONDENT(S)

ADDRESS

PHONE

Maintenance Technician, The Duncan Group

2612 Elm Ave.
Morro Bay, CA 93442

(805) 772-9759

CO-RESPONDENT(S)

ADDRESS

PHONE

Peoples' Self-Help Housing

3533 Empleo Street
San Luis Obispo, CA 93401

(805) 781-3088

AGENT FOR SERVICE

ADDRESS

PHONE

c/o Peoples' Self-Help Housing

3533 Empleo Street
San Luis Obispo, CA 93401

CO-RESPONDENT(S)

ADDRESS

PHONE

Social Worker, Peoples' Self-Help Housing

2612 Elm Ave.
Morro Bay, CA 93442

(805) 772-2419

RECEIVED

DEC 04 2017

Department of Fair Employment & Housing
Elk Grove

FORM REV 7/2015

Page 1

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**DEED NUMBER
[REDACTED]

HUD NUMBER

PROPERTY TYPE
ApartmentADDRESS WHERE VIOLATION OCCURED
[REDACTED]NO. OF UNITS
21

I ALLEGE THAT I EXPERIENCED

Discrimination, Harassment

ON OR BEFORE

July 16, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Race, Ancestry, Association with a member of a
protected class, Disability [physical/mental]

AS A RESULT, I WAS

Denied equal terms and conditions, Denied
reasonable accommodation, Subjected to
restrictive rule/covenant, Subjected to
discriminatory statements/advertisements,
Harassed

STATEMENT OF FACTS

- I. I believe I was discriminated against and harassed at the subject property located at [REDACTED]. The property has 21 units, is owned by Oceanside Gardens Limited Partnership and managed in partnership by The Duncan Group and Peoples' Self-Help Housing, which employs property manager [REDACTED], maintenance technician [REDACTED] and resident social worker [REDACTED].
- II. I was denied a reasonable accommodation and equal terms and conditions, subjected to discriminatory statements/advertisements and subjected to a restrictive rule/covenant due to my Race, Ancestry [Native American], Association with a member of a protected class and Disability [physical/mental], which are violations of Government Code, Sections 12955 (a), (c) and (f). My belief is based on the following:
- a. On or about August 2016, due to an oil leak from my truck, I was advised by Respondent [REDACTED] that I was not allowed to park in my assigned parking spot. Thereafter, I was subjected to park on the street which was a considerable distance from my unit and difficult for me since I use a cane due to my disability [physical]. My original spot was closer to my unit and I asked for a reasonable accommodation to keep parking inside. Respondents [REDACTED] took turns parking in my assigned parking spot on a daily basis. Respondent [REDACTED] went as far as parking her car in my assigned parking spot overnight, even though she lived at another apartment complex, to ensure that I would not have access to my parking spot. Occasionally, I would use the handicap parking spot located on the premises, only when loading and unloading my truck. When Respondent [REDACTED] noticed I was using the handicap parking spot, she made it a point to park there [illegally, since she does not have a handicap placard visible] as to also prevent me from further using handicap parking. Additionally, only when further pressure was put on, did Respondent [REDACTED] try to assist with resources that could help expedite my request for reasonable accommodation. For seven months, the Respondents made it close to impossible for me to get my reasonable accommodation.
- b. On or about August 8th and 23rd, 2016, during routine apartment inspections, on two separate occasions, Respondent [REDACTED] made discriminatory statements directed at me, including "I wouldn't know, I am not Indian" [due to my Native America ancestry] and calling me "taco man" [I have a Hispanic surname].

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

- c. On or about January 24, 2017, I submitted a reasonable accommodation to Respondent [REDACTED] requesting that I be allowed to park in my original parking spot due to my physical disability [which they knew of]. The request was initially rejected by Respondent [REDACTED]. Respondent [REDACTED] then requested that my doctor sign and return the appropriate forms.
- d. On or about May 2017, my mailbox was tampered with and as result I was unable to insert my key to access my mail. I reported this to Respondent [REDACTED] who then had Respondent [REDACTED] make the appropriate repairs. It took over two weeks to get my mailbox repaired and to get my new key, in the meantime I had no access to my mail. I believe that the delay in addressing my service request was in retaliation for my reasonable accommodation request and ongoing tensions.
- e. On or about July, 2017, I received a notice of intent to enter my dwelling from Respondent [REDACTED] on Sunday, July 16, 2017 to conduct an exhaust fan repair. I accommodated the request and stayed home to await for Respondent [REDACTED] arrival; the respondent never arrived. I believe that this service order was deliberately scheduled on a Sunday and then missed to further harass and inconvenience me.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

Printed Name

11/24/17



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR KEVIN KISH

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

November 20, 2017

Email: [REDACTED]

RE: Notice of Complaint

DFEH Number: [REDACTED]

[REDACTED] Oceanside Gardens Limited Partnership

Dear [REDACTED]

This notice confirms that you have filed a housing inquiry and have been interviewed by a Department of Fair Employment and Housing representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns. **If you do not return the signed complaint within 10 days, your inquiry will be closed and no further action will be taken.**

Please return the signed complaint using the Adobe EchoSign electronic signature. If you need further assistance, please feel free to contact the toll free telephone number at (800) 884-1684, with any questions you may have.

Please note that the information you provided is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
916-585-8143
carla.rubalcava@dfeh.ca.gov

RECEIVED

DEC 04 2017

Department of Fair Employment & Housing
Elk Grove

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

COMPLAINANT

ADDRESS

PHONE

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

ADDRESS

PHONE

29SC Sycamore LP

4251 23rd Street
San Francisco, CA 94114

(916) 366-6060

Dick James & Associates, Inc.

2260 Park Towne Circle, Ste. 204
Sacramento, CA 95825

(916) 332-7430

RW Zukin Corp.

4080 Campbell Ave.
Menlo Park, CA 94025

(650) 328-5050

AGENT FOR SERVICE

ADDRESS

PHONE

Capitol Corporate Services, Inc.,
Agent for Service for 29SC Sycamore
LPPo Box 1831
Austin, TX 78767Agent for Service for
Dick James & Associates, Inc.2260 Park Towne Circle, Ste. 204
Sacramento, CA 95825Agent for Service
for RW Zukin Corp.4080 Campbell Ave.
Menlo Park, CA 94025

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

120



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

I, [REDACTED] was discriminated against and denied reasonable accommodation for a disability or medical condition at the subject property [REDACTED]. The subject property is an apartment complex with approximately 120 units. The complex is owned by 29SC Sycamore, LP and has been managed by Dick James & Associates, Inc. and RW Zukin Corp.

On or about 2017, due to my physical disability, I submitted a reasonable modification to management requesting that a shower handle be installed in my shower. Management denied this request.

On or about 2017, due to my physical disability, I submitted a reasonable accommodation to management requesting that my front door's security door be installed properly. The security door in my unit seems to have been installed backwards and due to my physical disability, it makes it very difficult for me to open the door.

On or about September 2017, due to my physical disability, I submitted a reasonable accommodation to management requesting a nearby handicapped parking space. Management denied this request.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

May 1, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Race; Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

We were discriminated against and denied equal terms and conditions at the subject property [REDACTED]. The subject property is an apartment complex with approximately 120 units. The complex is owned by 29SC Sycamore, LP and has been managed by Dick James & Associates, Inc. and RW Zukin Corp.

On or about September 2017, we submitted service requests for the collapsing kitchen sink, mold in the bathroom and bathroom countertops. Our service requests were ignored.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

On or about December 2017, we requested keys to the complex's walk-in gate and pool, but our request was denied.

On or about late-February 2018, we again submitted service requests for the collapsing kitchen sink, mold in the bathroom and bathroom countertops. Our service requests were ignored.

On or about early May, 2018, we received a 60-day notice to vacate.

We believe we are being discriminated and are being denied equal terms and conditions due to our race (African-American) and past reasonable accommodation requests. We have personal knowledge that other tenants are receiving these services.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

05/19/18

SIGNATURE OF CO-COMPLAINANT OR CO-COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

05.19.18

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MAY 23 2018

Page 3 of 3

Department of Fair Employment and Housing
Elk Grove



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 31, 2018

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]

RE: Request to Approve Amended Complaint

DFEH Number: [REDACTED]

HUD Number: [REDACTED]

[REDACTED] et al.

Dear [REDACTED]

We have amended your complaint based on the changes you requested. Please read the proposed amended complaint carefully. If you do not approve of the language on the complaint, do not sign it; instead, contact me **within ten (10) calendar days** to discuss your concerns. If you agree with the language, please sign and return the amended complaint as soon as possible. We must receive the signed complaint before it can be investigated. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at deborahf.brown@dfeh.ca.gov or by fax to 1-888-519-5917.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,

Deborah F. Brown
Consultant III (Specialist)
916-585-7085
deborahf.brown@dfeh.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

21

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

December 31, 2016

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

a. On or around December 2016, I made two reasonable accommodation requests to Respondent [REDACTED]. I informed management that I needed a disabled parking space. I also informed them that I, and other disabled tenants at the property, needed access to the main gate because the paving was uneven and there was a ledge blocking the disabled tenants from getting access to the gate.



AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

Dfeh NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

b. I have not received a response to date to my reasonable accommodation requests, which effectively resulted in a denial of my accommodation.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

{{Dte_es_:signer1:
date}}



AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

OTHER AGGRIEVED PARTIES

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

ADDRESS

PHONE

Building Better Neighborhoods, Inc.

1076 North State Street
Ukiah, CA 95482

7074635462

[REDACTED] Manager

1076 North State Street
Ukiah, CA 95482

7074635462

[REDACTED] Housing Manager

1076 North Street
Ukiah, CA 95482

7074635462

[REDACTED]
Community Development
Commission of Mendocino County

1076 North State Street
Ukiah, California 95482

7074635462

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

[REDACTED]

10

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

April 19, 2017

File Date: June 2, 2017
Amended

RECEIVED

FEB 9 2018

Page 1 of 3

Department of Fair Employment & Housing
Elk Grove



AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

HUD NUMBER

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

Complainants are [REDACTED] and her eleven year old son. Respondents are [REDACTED] (Manager), [REDACTED] (Housing Manager), Community Development Commission of Mendocino County (Operator), and Building Better Neighborhoods, Inc. (Owner). Complainant and Complainant's son are disabled as defined by the federal Fair Housing Act. Complainant's son requires the assistance of a health aide throughout the day and night. Complainant has a visual processing disability.

In 2014 Complainant informed Respondent complex that her son was severely disabled and made three requests for accommodations for his disability. She provided medical verification for the requests from the son's therapist. Complainant alleges the request was effectively denied by Respondents due to the preconditions placed on approving the request.

Complainant recently re-submitted the three accommodation requests with supporting documentation from her son's therapist for each. They were:

1. That Complainant's adult son, who is a prior resident of the household and medically trained, move back into the home as a health aide;
2. Complainants be able to move into an apartment with an additional bedroom to enable Complainant's disabled son to have equipment in an exercise room; and,
3. Complainant's disabled son be able to get a young service dog, which Complainant's therapist recommended be a puppy to assist Complainant's son to bond with the dog.

On March 9, 2017 Respondent [REDACTED] denied the request for a service dog until the Complainant could propose a specific older dog that already has all its adult shots, was neutered, and licensed. Respondent [REDACTED] also refused to consider any specific dog until all conditions were met and required that the dog never be on the property until it was approved. These prerequisites require Complainant to invest in the animal without any guarantee it would be approved. Respondent [REDACTED] further declined to consider the other two accommodation requests until Complainant was approved for the dog.

Respondent [REDACTED] also submitted a demand for many details regarding Complainant son's disability with a four day deadline for submission. On or about March 12 -13, 2017, Complainant provided the requested details and resubmitted her accommodation requests, noting that there should be no delay in processing the requests for an additional bedroom or her adult son's move back into the household as a health aide.

Complainant did not hear back for more than five weeks until she received another denial of all accommodation requests on April 19, 2017, from Respondent [REDACTED]

Accompanying the denial was a demand for another long list of information about the household and Complainant's son. Complainant notes that Respondent managers have known about her son's disability since 2014, and have repeatedly received medical verification of the connection between the disability and each of the three requests. On April 30, 2017, Respondents approved the request for Complainant's adult son to be a health aid, but denied the other two requests.



**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

02-04-2017



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

April 16, 2018

Via Email: [REDACTED]

[REDACTED]

RE: Request to Approve Amended Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

We have amended your complaint to add the Unruh Civil Rights Act (Civil Code Section 51). Please read the proposed amended complaint carefully. If you agree with the language, please follow the Adobe EchoSign instructions to sign and return the amended complaint via email. If you do not approve of the language on the amended complaint, **do not sign it**; instead, contact me immediately at my direct telephone number or email address listed below my signature to discuss your concerns. We must receive the signed complaint before it can be investigated.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,

Adele Cox

Adele Cox
Associated Governmental Program Analyst
(510) 789-1060
adele.cox@dfeh.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****Dfeh NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

House

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

1

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

September 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From on or about September 8, 2017 to September 30, 2017, I was denied a reasonable accommodation/interactive process while residing in a two-bedroom owner occupied house located at the subject address. The subject property is owned and managed by [REDACTED] resides in the other bedroom in the house. My rental amount is \$800.

On September 18, 2017, I requested a reasonable accommodation for [REDACTED] not enter my bedroom and a lock to be installed on my bedroom door. I explained to [REDACTED] that I have medical, documented diagnosis for disability, and her entering my room exacerbates my disability. [REDACTED] refused, saying "this is my house, I can go into the room whenever I want", thus denying my reasonable accommodation. In addition, [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

September 23, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

PARTICULARS

From on or about September 8, 2017 to September 30, 2017, I experienced harassment from [REDACTED] I believe I experienced harassment because of my disability (mental).

From on or about September 8, 2017 to September 30, 2017, whenever I interacted with [REDACTED] she would shout, swear, and make derogatory comments (details on file with DFEH) although I notified her this exacerbates my disability. The yelling, swearing and derogatory comments created a hostile living environment.

This is violation of Government Code 12955, Subdivision (a) and (c).

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

September 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On September 18, 2017, I informed [REDACTED] of my disability (mental), and requested reasonable accommodation. On September 21, 2017, I informed [REDACTED] I would be moving out. On September 23, 2017, I returned to the subject property to collect my personal belongings, and found the house lock had been changed. I did not receive an explanation or notice to vacate. I believe the lock had been changed in retaliation for my request for reasonable accommodation. In addition, in retaliation, [REDACTED] did not return my deposit and instead charged me for storage of my personal belongings when I attempted to pick up my items on September 23, 2017.

This is a violation Government Code, Section 12955, Subdivision (f).

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Apr 16, 2018

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

COMPLAINANT(S)

ADDRESS

PHONE

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW

General - 12955 a

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

ADDRESS

PHONE

AGENT FOR SERVICE

ADDRESS

PHONE

CO-RESPONDENT(S)

ADDRESS

PHONE

RECEIVED

NOV 27 2017

Department of Fair Employment & Housing
Elk Grove

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

PROPERTY TYPE

Trailer Space or Mobile Home

ADDRESS WHERE VIOLATION OCCURED

NO. OF UNITS

60

I ALLEGE THAT I EXPERIENCED

Discrimination, Retaliation

ON OR BEFORE

June 16, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability - [physical or mental], Engagement in
protected activity

AS A RESULT, I WAS

Denied equal terms and conditions, Denied
reasonable accommodation, Evicted

STATEMENT OF FACTS

I. From March 25, 2017 to June 16, 2017, I was denied a reasonable accommodation, retaliated against and denied equal terms and conditions while residing in my 2-bedroom mobile home located at [REDACTED]

[REDACTED] The property has 60 units and is owned by [REDACTED] and managed by [REDACTED].
My rental amount is \$470.

II. I believe that I was denied a reasonable accommodation (emotional support animal), denied equal terms and conditions, and evicted in retaliation due to my disability (mental) and engagement in a protected activity (reasonable accommodation request). This is a violation of Government Code section 12955(a) and (f). My belief is based on the following:

A. On March 25, 2017, I was denied a reasonable accommodation request and subjected to differential treatment when I was served with a 7 day notice to comply with park rules due to my emotional support animal not being on a leash. In addition, the notice stated I needed pre-approval for my emotional support animal. I have witnessed other tenants, who are not disabled, be allowed to have their pets unleashed and not be served the same notice to comply.

B. On April 16, 2017, I was served with a 60 day notice to vacate as a result of a second complaint about my emotional support animal not being on a leash. I believe the notice was served in retaliation for me not getting rid of my emotional support animal which I need in order to support my mental disability.

C. On June 16, 2017, I moved out of the mobile home park as a result of me not being allowed to keep my emotional support animal.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**DFEH NUMBER
[REDACTED]

HUD NUMBER

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:
[REDACTED]Date:
11/21/17Printed Name:
[REDACTED]



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR KEVIN KISH

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-684-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

November 17, 2017

KEEP FOR YOUR RECORDS

RE: Request to Approve Complaint

DFEH Matter Number: [REDACTED]

Dear [REDACTED]

This notice confirms that you have filed an inquiry and have been interviewed by a Department of Fair Employment and Housing (DFEH) representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns.

Please return the signed complaint by mail to DFEH, 2218 Kausen Dr. Suite 100 Elk Grove, CA 95758 or by email to the email address below or by fax to 888-519-5917. **If you do not return the signed complaint within 10 days, your inquiry will be closed and no further action will be taken.**

If your pre-complaint inquiry is closed and you would like to appeal the decision, you may submit a written request within 10 days of the closure date to DFEH, District Administrator Colleen Janatpour, 2218 Kausen Drive, Suite 100 Elk Grove, CA or Colleen.Janatpour@dfeh.ca.gov or call (510)789-1040.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Lareeceia Harris
Staff Services Analyst
510-789-1051
lareeceia.harris@dfeh.ca.gov

RECEIVED
NOV 27 2017
Department of Fair Employment & Housing
Elk Grove



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN, JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

February 14, 2018

Via [First Class Mail] [Email]



RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] Camden Main And Jamboree et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via Echosign. If you do not approve of the language on the complaint, do not sign it; instead, contact me at my direct telephone number listed below my signature to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Ericka Njemanze

Ericka Njemanze

Sff Services Analyst

510-789-1047

ericka.njemanze@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)**ADDRESS****PHONE**

Camden Main And Jamboree

2801 Main Street
Irvine, California 92614

866-647-3293

[REDACTED]

Office 2801 Main Street
Irvine, California 92614

949-833-7900

[REDACTED]

Office 2801 Main Street
Irvine, California 92614

949-833-7900

[REDACTED]

Office 2801 Main Street
Irvine, California 92614

949-833-7900

[REDACTED]

2801 Main Street
Irvine, CA 92614

866-647-3293

John Thorpe Successor Trust

601 W. 5th Street, Ste. 800
Los Angeles, CA 90071-2009

213-680-9940

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE**ADDRESS WHERE VIOLATION
OCCURRED****NO. OF UNITS**

Apartment

[REDACTED]

292



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From January 12, 2017 to November 1, 2017, I was denied a reasonable accommodation for a closer parking space while residing in my 2 bedroom unit located at [REDACTED]. The monthly rent was \$1595 and there are 292 units. The subject property is owned by John G. Thorpe Successor Trust and managed by Camden aka Camden Main & Jamboree and the their employees, [REDACTED] and Senior Vice President of Camden Main & Jamboree, [REDACTED].

From January 12, 2017 to November 1, 2017, I made a reasonable accommodation request for a closer parking space to my unit due to my physical disability. This request was made at least once or twice a month. The assistant manager, [REDACTED] said they were not going to help me thus denying my reasonable accommodation, which exacerbated my disability and there was no interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Unruh Civil Code 51.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

July 27, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

From January 12, 2017 to July 2017, I made a reasonable accommodation request for closer parking spot at least once or twice a month and on July 27, 2017, in retaliation management served me with a violation notice for leaving a stroller outside of my unit. However, I am aware of other tenants who have left items outside of their units and management did not serve these tenants with a similar violation notice.

This a violation of Government Code, Section 12955, Subdivision (a) and (f) and Unruh Civil Code 51

- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

October 13, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER**PARTICULARS**

On August 5, 2017, August 24, 2017 and September 3, 2017, Respondent, [REDACTED] visually harassed me due to my national origin, which created a hostile living environment.

On August 24, 2017, I reported the visual harassment to the Senior Vice President of Camden, [REDACTED] to no avail.

On September 21, 2017, Respondent, [REDACTED] made the following verbal harassing comment, "I am going to hurt you and your family", which I believe is due to our national origin.

On October 13, 2017, I had to file a restraining order due to the continued visual and verbal harassment.

This is a violation of Government Code, Section 12955, Subdivision (a).

- Allegation 4 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

October 24, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED**PARTICULARS**

On October 23, 2017, Respondent, [REDACTED] made the following derogatory comment, "Move out you Muslim Terrorist". This derogatory comment created a hostile living environment.

On October 24, 2017, my neighbor made a derogatory comment to me based on his perception of my religion (details on file with DFEH). I sent a complaint through the management website to no avail.

This is a violation of Government Code, Section 12955, Subdivision (a).

- Allegation 5 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

November 20, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On November 3, 2017, Respondents failed to accept my rent in retaliation and on November 17, 2017, served me with a retaliatory eviction for reporting harassment based on my national origin, for opposing harassment due to Respondent's perception of my religion and for making a reasonable accommodation once or twice a month starting January 2017. We vacated our unit on November 20, 2017.

This is a violation of Government Code, Section 12955, Subdivision (f) and Civil Code 51.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Feb 20, 2018

{{Dte_es_:signer1:
date}}



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfefh.ca.gov

March 14, 2018

Via Email



RE: Request to Approve Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Ericka Njemanze

Ericka Njemanze
Staff Services Analyst
(510) 789-1047
ericka.njemanze@dfefh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY
WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

4



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 16, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Marital status

AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory statements/advertisement

PARTICULARS

On July 16, 2017, we were subjected to a discriminatory inquiry at the subject property where the violation occurred, [REDACTED] which is a 2-bedroom unit. There are 4 units and our rental amount was \$2145. The subject property is owned and managed by [REDACTED]

On July 19, 2017, we met with Respondent, [REDACTED] and during this meeting he asked if we were married.

This is a violation of Government Code, Section 12955, Subdivision (b) and Civil Code 51.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Familial status (Children)

AS A RESULT, I WAS SUBJECTED TO

Subjected to restrictive rule/covenant

PARTICULARS

From July 16, 2017 to November 30, 2018, we were subjected to overly restrictive rules. On July 16, 2017, when we met with [REDACTED] he stated that our child was not allowed to play outside and because of this comment, we did not allow our child to play outside during our tenancy.

This is a violation of Government Code Section 12955, Subdivision (a) and Civil Code 51.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

PARTICULARS

From July 16, 2017 to November 30, 2017, we were subjected to harassment based on our disability (mental) and race (African-American).

On July 16, 2017, we made Respondent, [REDACTED] aware of Complainant, [REDACTED] disability. On August 7, 2017, [REDACTED] came to our unit regarding a repair. During this visit, [REDACTED] became loud and yelled at [REDACTED] starting, "Well why don't you go ahead and hit me!" [REDACTED] was aware that this statement would trigger [REDACTED] disability and therefore, we believe this was harassment based on [REDACTED] disability, which created a hostile living environment.

From July 16, 2017 to November 30, 2017, during our tenancy Respondent, [REDACTED] made several verbal harassing statements when he referenced us as "you people", which we believe is based on our race, which created a hostile living environment.

This is violation of Government Code Section 12955, Subdivision (a).

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

- Allegation 4 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Race

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On October 4, 2017, we were served with an eviction and vacated on November 30, 2017, which we believe is based on our disability (mental) and race (African-American).

On October 4, 2017, served us with an eviction notice. On October 30, 2017, we attended an unlawful detainer and was forced out on November 30, 2017. We believe we were evicted due to disability because attempted to trigger his disability by making discriminatory/harassing statements during our tenancy. In addition, we believe the eviction is racially motivated because made several statements referring to us as, "you people" during our tenancy.

This is violation of Government Code Section 12955, Subdivision (a) and Civil Code 51.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

**SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL
REPRESENTATIVE:****DATE:**

Mar 14, 2018

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE: DATE:

Mar 14, 2018



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

May 9, 2018

Via Email

RE: Request to Approve Complaint

DFFH Number: [REDACTED]

[REDACTED] MidPen Housing Corporation et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My information is below.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Ericka Njemanze

Ericka Njemanze
Staff Services Analyst
(510) 789-1047
ericka.njemanze@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

MidPen Housing Corporation

ADDRESS

303 Vintage Park Drive, Ste. 250
Foster City, CA 94404

PHONE

650-356-2900

MP San Mateo Transit Associates,
LP303 Vintage Park, Ste. 250
Foster City, CA 94404

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for
Service for MP San Mateo Transit
Associates, LP

ADDRESS

303 Vintage Park, Ste. 250
Foster City, CA 94404

PHONE

[REDACTED] Agent for
Service for MidPen Housing
Corporation303 Vintage Park, Ste. 250
Foster City, CA 94404

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

68



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

December 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Race

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

From January 3, 2017 to December 1, 2017, I was subjected to differential treatment while residing in my 2-bedroom unit located at [REDACTED]. The owner is MP San Mateo Transit Associates, LP and is managed by MidPen Housing Corporation and its employee [REDACTED]. There are 68 units and my rent was \$394 and the balance is paid by Section 8.

I believe I was subjected to differential treatment due to my race (African-American).

On January 3, 2017, I requested to reserve the community room in advance for a family function. However, for each date requested, I was denied. On January 7, 2017, which is the date I wanted to reserve the room, it was not being used by any other tenant. On January 14, 2017, a non-African-American tenant notified me that she recently reserved the community room on January 10, 2017, just four days prior to her event and she was approved.

On March 1, 2017, I was verbally notified by the manager, [REDACTED], that she called the police on my son claiming he fired a pellet gun. However, it is my understanding that there were several non-African-American children who were involved and [REDACTED] did not call the police on these other children.

On June 1, 2017, [REDACTED] asked if I get food stamps, stated I was lucky to be in a program that helped me with my rent, wanted to know how I could afford to feed my family, and asked if my children's father paid child support. I believe [REDACTED] does not ask these type of questions to non-African-American tenants.

On October 1, 2017, [REDACTED] called me and stated I needed to get written approval before having my carpets cleaned.

However, I am aware of a non-African-American tenant who was not required to get written approval before having her carpets cleaned.

On December 1, 2017, [REDACTED] came outside and told my two children that they needed to remove their remote control cars from the premises. However, she did not state the same to the non-African-American children who were also playing with remote control cars.

This is a violation of Government Code Section 12955, Subdivision (a) and Civil Code 51.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

December 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From February 1, 2017 to December 1, 2017, I was denied a reasonable accommodation/interactive process while residing at the subject property.

I believe I was denied a reasonable accommodation due to my son's disability (physical).

On February 1, 2017, I requested a larger unit due to my son's disability. Although it was approved, the manager [REDACTED] denied the request stating there was no validity of the accommodation, which exacerbated by son's disability. In addition, [REDACTED] failed to engage in an interactive process.

On December 1, 2017, I followed-up with [REDACTED] regarding the reasonable accommodation to transfer to a larger unit, but she stated there were no units available. However, I believe there was a unit available from my first request of February 1, 2017 to my last request December 1, 2017. This denial exacerbated my son's disability. In addition, [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code Section 12955, Subdivision (a) and Civil Code 51.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

[REDACTED]

May 14, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

February 14, 2018

Via [First Class Mail] [Email]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] VK CK Sherman Oaks Venture, LLC et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

ADDRESS

PHONE

WK CK Sherman Oaks Venture, LLC

30 S. Wacker Drive, Suite 3600
Chicago, IL 60606

(312) 948-4500

Waterton Property Management, LLC

30 S. Wacker Drive, Suite 3600
Chicago, IL 60606

(312) 948-4500

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

ADDRESS

PHONE

CT Corporation System, Agent for
Service for WK CK Sherman Oaks
Venture, LLC818 West Seventh Street, Suite 930
Los Angeles, CA 90017CT Corporation System, Agent for
Service for Waterton Property
Management, LLC818 West Seventh Street, Suite 930
Los Angeles, CA 90017

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

[REDACTED]

260

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

May 3, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about May 3, 2017, due to my disability [physical], I submitted a supplemental reasonable accommodation request to Respondents McIlwaine, Wilmore and Tenant Liaison [REDACTED] requesting to be relocated to a quiet/non-smoking apartment away from all the impending construction that would be happening inside and around my unit. This reasonable accommodation request was a follow-up to my original reasonable accommodation request to be moved to a unit on a specific area of the property that was submitted and approved by management on or about June, 2015. In my original reasonable accommodation request I requested to be permanently relocated because my downstairs neighbor is a chain smoker and inhaling second-hand smoke has caused me asthma, exacerbated this disability [physical] and ability to breathe. Respondents have done everything in their power to deny or interfere with my reasonable accommodation requests and to date I have not been relocated.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

May 31, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

On or about late-May 2017, my next door neighbor, who is on a non-smoking lease and should not be allowed to smoke anywhere on the premises, was verbally told by Respondent [REDACTED] that she was permitted to smoke outside of the apartment, including her balcony. I believe this was deliberately done by Respondent [REDACTED] to further discriminate and harass me for requesting a reasonable accommodation to be moved because of my smoking neighbors. Additionally, this should have never been permitted by Respondent [REDACTED] since he knows about my reasonable accommodation request and my disability that can be exacerbated by second-hand smoke.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

February 7, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Age (40 and over); Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

- a. On or about December 2, 2017, I received a 3-day notice from Respondent Waterton Property Management, LLC through my lawyer for allegedly parking incorrectly and for having my dog off the leash.
- b. On or about January 25, 2018, I received a 3-day notice to cure from Respondent Waterton Property Management for allegedly blocking accesses and causing a safety hazard due to the presence of boxes and plant outside of my unit.
- c. On or about February 7, 2018, I received another 3-day notice to quit despite the fact that I have responded and/or cured what was asked. In the last year, I have received approximately five 3-day notices and attorney letters regarding situations at the complex that I believe have been handled appropriately by my part. I have personal knowledge that other tenants are not getting the same amount of 3-day notices, if any at all. I believe Respondents at Waterton Property Management, LLC are constantly issuing me baseless 3-day notices as a harassment tactic to push me out as a tenant due to my age and reasonable accommodations requests.

- Allegation 4 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

February 7, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Age (40 and over); Disability (physical or mental)

PARTICULARS

- a. On or about December 2, 2017, I received a 3-day notice from Respondent Waterton Property Management, LLC through my lawyer for allegedly parking incorrectly and for having my dog off the leash.
- b. On or about January 25, 2018, I received a 3-day notice to cure from Respondent Waterton Property Management for allegedly blocking accesses and causing a safety hazard due to the presence of boxes and plant outside of my unit.
- c. On or about February 7, 2018, I received another 3-day notice to quit despite the fact that I have responded and/or cured what was asked. In the last year, I have received approximately five 3-day notices and attorney letters regarding situations at the complex that I believe have been handled appropriately by my part. I have personal knowledge that other tenants are not getting the same amount of 3-day notices, if any at all. I believe Respondents at Waterton Property Management, LLC are constantly issuing me baseless 3-day notices as a harassment tactic to push me out as a tenant due to my age and reasonable accommodations requests.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



Feb 14, 2018

DATE:



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfefh.ca.gov

January 3, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Laurelglen Properties LLC et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldue@dfefh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldue
Associate Governmental Program Analyst
916-585-8153
mario.anzaldue@dfefh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Laurelglen Properties LLC

ADDRESS1181 California Ave., #170
Corona, CA 92881**PHONE**

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE[REDACTED] Agent for Service for
Laurelglen Properties LLC**ADDRESS**6900 Mountain View Rd
Bakersfield, CA 93307**PHONE****PROPERTY TYPE**

Apartment

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

336

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

July 28, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

950747-308425

On or about July 28, 2017, I submitted a reasonable accommodation request to Respondent [REDACTED] to have the painting crew wear medically necessary protective gear while on my balcony; this is a requirement of my disability and condition. Respondent [REDACTED] denied my request.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

August 3, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

On or about August 2, 2017, Respondent [REDACTED] cut all communications with me and had her attorney send my husband and me a threatening letter stating our behavior was in violation of our lease and that it interfered with their ability to complete their work. All I wanted was my reasonable accommodation granted.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

[REDACTED]

Jan 4, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 22, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]

RE: Request to Approve Complaint

DEEH Number: [REDACTED]

[REDACTED] WP Overland Court Apartments, LP et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

ADDRESS

PHONE

WP Overland Court Apartments, LP

310 N Westlake Blvd. #210
Westlake Village, CA 91362

Buckingham Property Management

2170 N Winery Ave.
Fresno, CA 93703

(559) 452-8250

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

ADDRESS

PHONE

[REDACTED] Agent for Service
for Buckingham Property
Management2170 N Winery Ave.
Fresno, CA 93703[REDACTED] Agent for Service for
WP Overland Court Apartments, LP310 N Westlake Blvd. #210
Westlake Village, CA 91362

PROPERTY TYPE

ADDRESS WHERE VIOLATION
OCCURRED

NO. OF UNITS

Apartment

[REDACTED]

70



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 17, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied rental/sale/lease; Denied reasonable accommodation for a disability or medical condition; Denied equal terms and conditions

PARTICULARS

On or about July 17, 2017, I was denied rental due of my Emotional Support Animal [ESA]. Although I had all the proper documentation for my ESA, property manager Respondent [REDACTED] failed to engage in an interactive process and stated that under no circumstances were pets allowed. I went through a lengthy application process, including an interview on or about May 17, 2017, where there had been no mention of pets not being allowed.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Dec 29, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 28, 2017

Via [First Class Mail] [Email]

[REDACTED]

RE: Request to Approve Complaint
DFEH Number: [REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

Capron Real Estate, Inc. DBA
Vertical Horizon Real Estate &
Property Management2220 Otay Lakes Rd., Suite 502-92
Chula Vista, CA 91915

(619) 847-3100

AGENT FOR SERVICE

[REDACTED] Agent for
Service for Capron Real Estate, Inc.
DBA Vertical Horizon Real Estate &
Property Management

ADDRESS

2220 Otay Lakes Rd, Suite 502-92
Chula Vista, CA 91915

PHONE

(619) 847-3100

PROPERTY TYPE

Condominium

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

100



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

June 22, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about June 22, 2017, I submitted a reasonable accommodation to Respondent [REDACTED] requesting that I be allowed to have my newly prescribed Emotional Support Animal [ESA] live with me. Respondent [REDACTED] immediately denied my request, did not engage in an interactive process and threatened to evict my roommate and me. I immediately rehomed my ESA with a relative out-of-state, due to fear of being evicted.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 24, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about July 24, 2017, due to push back from Respondent [REDACTED] I submitted a second, more detailed reasonable accommodation letter, requesting that my ESA be allowed to live with me. Respondent [REDACTED] had previously mentioned that the first letter was not specific because it didn't state what my disability was and how the ESA would help me. Respondent [REDACTED] discussed my second reasonable accommodation request with the owner, Respondent [REDACTED] and they decided to again deny my request.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 2, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied equal terms and conditions

PARTICULARS

On or about September 2, 2017, I emailed Respondent [REDACTED] a copy of the Fair Employment and Housing Act highlighting my rights as a tenant to have an ESA. To date, Respondents [REDACTED] have not responded to this email and maintain that my ESA is not allowed at the subject property.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

Dec 28, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 21, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]
RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] The Steven W. Reiss Trust Dated May 8, 1998 et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code 12955

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

The Steven W. Reiss Trust Dated
May 8, 1998

ADDRESS

1574 W Alexis Ave.
Anaheim, CA 92802

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Other (Duplex)

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

2



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

January 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about January 2017, due to my disability [mental/physical], I submitted a reasonable accommodation to Respondent [REDACTED] requesting the mold in my unit be removed because it was exacerbating my condition. On or about February 2017, a mold specialist came out and determined the mold damage was extensive and major tear out and repairs needed to be done. I was moved to a hotel, which the landlord reluctantly paid, while the mold in my unit was removed. I moved back in to my unit after the repairs were made, but I quickly noticed that the mold was not properly removed and was merely painted over. We reported this to Respondent [REDACTED] letting her know that my reasonable accommodation request was not properly addressed.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

August 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied equal terms and conditions

PARTICULARS

On or about late August, 2017, I received a 60-day notice to vacate from Respondent [REDACTED] I believe this notice was in retaliation for being vocal about the mold and for requesting reasonable accommodation due to my disability.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 11, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Denied equal terms and conditions

PARTICULARS

On or about September 11, 2017, we were notified that an unlawful detainer was filed by Respondent [REDACTED]

- Allegation 4 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 8, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS

Evicted

PARTICULARS

On or about November 8, 2017, I was evicted by Respondents [REDACTED] I believe I was ultimately evicted for being vocal about the mold issue in my unit and for requesting a reasonable accommodation.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

Dec 27, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 22, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] The Kelly Armstrong Revocable Inter Vivos Trust, Dated February 23, 2012 et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code 12955 & 12955.7

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

The Kelly Armstrong Revocable Inter
Vivos Trust, Dated February 23, 2012

ADDRESS

63 Central Ave.
Sausalito, CA 94965

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

2

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

August 27, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS**PARTICULARS**

On or about August 27, 2017, I told Respondent [REDACTED] I had a mental disability. Upon learning of my disability, Respondent [REDACTED] started to make more inquiries and insinuations about my disability.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

September 11, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS**PARTICULARS**

On or about September 11, 2017, I received a harassing email from Respondent [REDACTED] with a link to a news article concerning my disability and a message stating, "32 days and counting" [a countdown to the day I would be moving out]. Also on or about September 11, 2017, Respondent [REDACTED] sent me an email threatening me. She asked me what I was willing to pay her to resolve what she thought I owed. She was trying to intimidate me with knowledge she had of my past and background concerning my mental disability. Respondent [REDACTED] never gave me a concrete amount I owed. I believe she was trying to extort more money from me by insinuating she could divulge my medical history and my past.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

September 18, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS**PARTICULARS**

On or about September 18, 2017, Respondent [REDACTED] sent me an email stating, "you have been prescribed multiple Rx medications for your condition and might also be diagnosed as schizophrenic". Respondent [REDACTED] started to harass me and treat me different upon learning of my disability.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

Dec 23, 2017



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

February 16, 2018

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]
RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Friendship Manor, Inc. et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Friendship Manor, Inc.

ADDRESS

6647 El Colegio Rd.
Goleta, CA 93117

PHONE

(805) 968-0771

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for Service for
Friendship Manor, Inc.

ADDRESS

6647 El Colegio Rd.
Goleta, CA 93117

PHONE

PROPERTY TYPE

Condominium

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

200



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

October 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

On or about October, 2017, I submitted a reasonable accommodation to Respondent [REDACTED] requesting that I be allowed to keep the window air conditioner due to my disability [physical]. Respondent [REDACTED] failed to engage in an interactive process even though I provided him my doctor's note.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

January 1, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

a. On or about November, 2017, Respondent [REDACTED] served me with an eviction notice and a letter stating that I was being evicted for having a window air conditioner. I believe I was being discriminated because of my reasonable accommodation request and medical need for an air conditioner.

b. On or about January 2018, I was evicted by Respondent [REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

[REDACTED]

DATE:

Feb 16, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

July 27, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Amended Complaint

DFEH Number: [REDACTED]

HUD Number: [REDACTED]

Dear [REDACTED]

We have amended your complaint. Please read the proposed amended complaint carefully. If you do not approve of the language on the complaint, do not sign it; instead, contact me **within ten (10) calendar days** to discuss your concerns. If you agree with the language, please sign and return the amended complaint as soon as possible. We must receive the signed complaint before it can be investigated. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at lezie.cannon@dfeh.ca.gov or by fax to 1-888-519-5917.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,

Lezlie Cannon

Lezlie Cannon
Staff Services Manager I
916-585-8154
lezie.cannon@dfeh.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

R and J. Scott Living Trust Dated
April 4, 2007715 N. Central Avenue #300
Glendale, CA 91203

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

20

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

- Allegation -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

March 2, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

The Complainant is [REDACTED] who is disabled as defined by the federal Fair Housing Act. The Respondents are [REDACTED] [Property Manager], [REDACTED] [Property Manager], [REDACTED] Agent of David N. Schultz, Inc., David N. Schultz, Inc. [Property Management Company] and Park Encino, LLC [Owner].

The Complainant moved to the subject property in or around 03/2015, believing it to be smoke-free. However, as the Complainant soon learned, the subject property was not, in fact, smoke-free, and upon complaining to the Respondents, floor-plan schematic signs were placed around the subject property indicating smoking designations for individual units.

On or around 07/28/2016, new tenants moved into a unit adjacent to the Complainant's, only for her to discover that they were smokers. On 03/02/2017, on behalf of the Complainant, a local fair housing agency submitted to separate doctor's letters to the Respondents, each of which identified the Complainant as an individual with a disability, explained that her disabilities were exacerbated by the exposure to second-hand smoke, and reiterated the Complainant's request for a reasonable accommodation to address the smoking at the subject property. As her complaints to the Respondents went ignored, she began to deposit half of each month's rent into escrow. Aside from a one-month period in which it appeared the smoker was gone, the Complainant deposited half of rent into escrow until in or around 04/2017, when the smoker seems to have left the subject property.

The Complainant alleges that the Respondents intimidated her, stonewalled her and stalled, and made the process overly and unnecessarily burdensome. Finally, in or around 04/2017, the Complainant sent the Respondents a letter requesting compensation for the loss of the use of her home as a result of the smoking.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.



AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

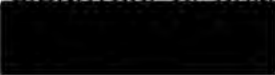
DFEH NUMBER



HUD NUMBER



SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

Jul 30, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

November 14, 2017

RE: Notice of Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

This notice confirms that you have filed a housing inquiry and have been interviewed by a Department of Fair Employment and Housing representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns. **If you do not return the signed complaint within 5 days, your inquiry will be closed and no further action will be taken.**

Please return the signed complaint using the Adobe EchoSign electronic signature. If you need further assistance, please feel free to contact the toll free telephone number at (800) 884-1684 with any questions you may have.

Please note that the information you provided is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Nora Baltierrez-Moreno

Nora Baltierrez-Moreno
Consultant II
661-395-2562
nora.baltierrez-moreno@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

COMPLAINANT(S)

ADDRESS

PHONE

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW

General - 12955 a

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

ADDRESS

PHONE

AGENT FOR SERVICE

ADDRESS

PHONE

CO-RESPONDENT(S)

ADDRESS

PHONE

[REDACTED] Director Berkeley
Housing Authority1936 University Avenue, Suite 150
Berkeley, California 94704

(510) 981-5470

[REDACTED] Housing Case
Manager/Berkeley Housing
Authority

1936 University Ave., Suite 150 Berkeley CA 94702

(510) 981-5470

LBL Properties

5735 Shattuck Avenue
Oakland, CA 94609

(510) 594-9700

[REDACTED]
LBL Properties5735 Shattuck Avenue
Oakland, CA 94609

(510) 594-9700

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEEH NUMBER

HUD NUMBER

PROPERTY TYPE
Apartment

ADDRESS WHERE VIOLATION OCCURED

NO. OF UNITS
4

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 26, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability - [physical or mental]

AS A RESULT, I WAS

Denied reasonable accommodation

STATEMENT OF FACTS

I. On April 26, 2017, I was denied reasonable accommodation while residing in my two bedroom apartment located at [REDACTED]. This property is an apartment complex with 4 units and is owned by [REDACTED] and managed by LBL Property, [REDACTED] Property Manager and Berkeley Housing Authority (HA), [REDACTED] Director, [REDACTED] Housing Representative and [REDACTED] Housing Representative. II. I believe that I was denied reasonable accommodation due to my disability. This is a violation of Government Code section 12955 (a). My belief is based on the following: A. On April 12, 2017, I informed the respondent that I needed reasonable accommodation due to my disability, specifically, I needed a 24 hour per day and seven days per week live-in aide. B. On April 26, 2017, I was denied reasonable accommodation by [REDACTED] Administrative Assistant. C. On June 6, 2017, I presented a letter from my primary care provider confirming my need for reasonable accommodation. This was my second request for reasonable accommodation. D. On June 27, 2017, the decision to deny me reasonable accommodation was upheld by [REDACTED] Director.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DEEH NUMBER

HUD NUMBER

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

Nov 14, 2017

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEED NUMBER

[REDACTED]

HUD NUMBER

COMPLAINANT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

OTHER AGGRIEVED PARTIES

TYPE OF DISCRIMINATION AND LAW
Harassment or Retaliation - 12955 f

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT

Vintage Chateau, LP

ADDRESS

325 N McDowell Blvd Petaluma California 94954

PHONE

AGENT FOR SERVICE

[REDACTED] Vintage Chateau And
USA Properties Fund

ADDRESS

3200 Douglas Blvd., Suite 200 Roseville California
95661

PHONE

CO-RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

USA Multifamily Management, Inc.
AKA USA Properties3200 Douglas Blvd., Suite 200 Roseville California
95661

(916) 773-6060

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DEFEASIBLE

FILE NUMBER

PROPERTY TYPE
Apartment

ADDRESS WHERE VIOLATION OCCURRED

NO. OF UNITS
75

I ALLEGED THAT I EXPERIENCED

Retaliation

ON OR BEFORE

August 29, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability - [physical or mental]

AS A RESULT, I WAS

Other

STATEMENT OF FACTS

- I. Following the serving of my DFEH complaint on February 14, 2017, and continuing, I believe I have been subjected to retaliation while residing at [REDACTED]. The 70-unit property is an apartment building owned by Vintage Chateau, LP and Managed by USA Properties Fund Inc. The manager is [REDACTED].
- II. I believe I am being subjected to retaliatory acts in the form of violation notices and subjected to unequal terms and conditions because of my engagement in a protected activity. On October 31, 2016 I filed a housing complaint with DFEH on the basis of denial of reasonable accommodation. I believe that based on this complaint, I have been subjected to retaliatory actions. This is violation of Government Code section 12955 (f). My belief is based on the following:
- a. On March 28, 2017, per my request, a maintenance man came to clean my kitchen floors. Prior to this, the manager, [REDACTED] sent me an email verifying the date and time and telling me to completely clear the floors in the area or the work would not be performed. I and my son, moved the furniture into the living room, including a table and chairs and left. When we returned we were notified by the maintenance man that the manager had performed a walk-through at that time.
- b. During the first week of May 2017, I received a lease violation notice from [REDACTED] stating that the path to the windows was blocked by furniture. Upon further investigation, I was informed that there is no provision in the lease that was violated, and instead that we had broken first a tax code, and later, a building code. [REDACTED] stated that a pathway must be kept clear to the windows and that if there was an earthquake or other emergency, she would not have been able to reach us. I informed [REDACTED] that the furniture was there temporarily due to the cleaning, that no one was in the unit at the time, and that the building code is used by contractors and therefore should not apply to tenants. Despite these reasons, I was told that I must sign and return the lease violation notice. I signed the violation "under duress".
- Since then, I have spoken with other tenants who also have furniture located in front of their windows who have not received any notices of lease violation.
- c. I have kept records of the emails exchanged between [REDACTED] and me as I believe this is in retaliation for the Fair Housing complaint I submitted to DFEH on October 31, 2016.
- d. [REDACTED] one of the maintenance persons on the property, also continues to use toxic chemicals in the common areas that exacerbate my medical conditions. This occurred during the period preceding

my housing complaint filed on October 31, 2016 and continuing. I believe that this is also in retaliation of filing a complaint of housing discrimination.



STATE OF CALIFORNIA - Department of Industrial Relations

520013

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

[REDACTED]

Y. C. BAKER

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as matters stated on my information and belief, and as to those matters I believe them to be true.

Signature of Complainant or Complainant's Agent (If Represented)

[REDACTED]

Date:

Oct 2, 17



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

March 21, 2018

Via Email: [REDACTED]

[REDACTED]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Coronado Square, LP et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me on February 8, 2018. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via Adobe EchoSign electronic signature. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

If your inquiry is closed and you would like to appeal the decision, you may submit a written request within 10 days of the closure date to DFEH, Supervisor Colleen Janatpour, 2218 Kausen Drive, Suite 100 Elk Grove, CA 95758, colleen.janatpour@dfeh.ca.gov or by calling (510)789-1040.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Lareeceia Harris

Lareeceia Harris

Staff Services Analyst

510-789-1051

lareeceia.harris@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Coronado Square, LP

ADDRESS230 S Coronado St. #41
Los Angeles, CA 90057**PHONE**

(213) 387-5426

[REDACTED]

[REDACTED]

[REDACTED]

Unger & Associates

13347 Ventura Blvd Ste. 201
Sherman Oaks, CA 91423

(818) 783-4969

AGENT FOR SERVICE[REDACTED] Agent for Service for
Coronado Square, LP**ADDRESS**100 So. Citrus Ave
Los Angeles, CA 90036**PHONE**[REDACTED] Agent for Service for
Unger & Associates13347 Ventura Blvd Ste. 201
Sherman Oaks, CA 91423

(818) 783-4969

PROPERTY TYPE

Apartment

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

40



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

August 28, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

From April 2017 through August 28, 2017, I was denied reasonable accommodations/interactive process while residing in my one-bedroom apartment located at [REDACTED]. The subject property is owned by Coronado Square, LP and managed by Unger & Associates, Inc. and its employee [REDACTED]. The subject property has 40 units. My rental amount is \$1539.00.

In early spring 2017, the City of Los Angeles instructed [REDACTED] to place a padlock on the entrance gate because it was broken. After the padlock was placed on it, I made a reasonable accommodation request asking [REDACTED] to repair the gate lock to allow me to enter the pool areas closest to my door to accommodate my disability. This request was denied and [REDACTED] failed to engage in an interactive process.

From April 2017 through August 28, 2017, I made a reasonable accommodation request to the manager, [REDACTED] to allow me to have a closer parking space to accommodate my disability (physical). [REDACTED] told me she would need to look into it, but never did. In May 2017, I was aware that there were available parking spaces and I asked again for a closer parking space. However, [REDACTED] told me to ask another tenant if she would trade spaces with me. From May and August 2017, my neighbor moved out and I began to use the parking space #31, which was closer to my back door and accommodated my disability. However, [REDACTED] notified me that I was not allowed to park in this parking space, thus continuing to deny my requested for a closer parking space. This denial exacerbated my disability. In addition, [REDACTED] failed to engage in an interactive process.

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51 of the Unruh Act.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

May 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory statements/advertisement

PARTICULARS

In or around April 2017 through May 2017, I was subjected to discriminatory statements in regards to my disability (physical) by [REDACTED]. When I made the reasonable accommodation request to have a closer parking space to accommodate my disability, [REDACTED] said, "you do not look disabled and what is your problem". In addition, in May 2017, [REDACTED] stated "how are you able to work in the flower bed planting flowers if you are disabled".

This is a violation of Government Code, Section 12955, Subdivision (a) and Civil Code 51 of the Unruh Act.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Mar 27, 2018

Housing Discrimination Complaint

Case Number: [REDACTED]

DFEH Matter [REDACTED]

Date Filed: June 2, 2017

1. **Complainants:**

[REDACTED]

2. **Complainant Representatives:**

3. **Other Aggrieved Parties:**

4. **The following is alleged to have occurred or is about to occur:**

- Failure to make reasonable accommodation
- Discriminatory refusal to rent

5. **The alleged violation occurred because of:**

- Handicap

6. **Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):**

Cambridge Square Apartments
[REDACTED]

7. **Respondents:**

H&L Property Management
4304 Redwood Highway Ste. 200
San Rafael, CA 94903
[REDACTED]

RECEIVED

JUN 09 2017

Department of Fair Employment & Housing
Elk Grove

[REDACTED]
Rifkind Law Group
100 Drakes Landing Road, Suite 260
Greenbrae, CA 94904

8. The following is a brief and concise statement of the facts regarding the alleged violation:

Complainant [REDACTED] is a disabled veteran. Respondents are H&L Management Co. (Management Company) [REDACTED] (Manager) and their attorney [REDACTED]. Complainant alleges Respondents have refused to accommodate her disabilities.

In late September 2016, Complainant's medical provider altered her mental health medication, which on December 20, 2016 resulted in a manic episode on the property where she created noise, and someone called the police. As a result, the complainant was hospitalized. When she returned home from the hospital, she found a Three-Day Notice to Quit.

On January 5, 2017, there was an altercation between Complainant and Respondent [REDACTED] which resulted in Complainant being arrested and charged with false imprisonment (Complainant has since been admitted to a pretrial diversion program). Respondents issued Complainant a notice terminating her tenancy on January 16, 2017.

On March 5, 2017, Complainant's attorney at Sonoma County Legal Aid submitted a reasonable accommodation request asking Respondents to rescind the notice due to the aforementioned events being caused by her disability. Respondent [REDACTED] denied the request on March 20, 2017. Subsequently, Complainant submitted more detailed accommodation request to Respondent [REDACTED] on April 14, 2017. Respondent [REDACTED] denied the request, but offered to extend Complainant's tenancy until May 31, 2017. Complainant sought assistance from Fair Housing Advocates of Northern California, who explained to Respondent [REDACTED] that an extension did not meet Complainant's need, and followed up with further verification of Complainant's disabilities. This included a letter from her medical provider stating that the Complainant's medication has since stabilized, that she did not pose a threat to others, and that in his opinion, there was little likelihood the December and January events would occur again in the future. Complainant also offered to abide by a behavioral agreement. Despite intervening medical treatment to address Complainant's behavior, Respondent [REDACTED] has continued to deny Complainant's request to allow her to remain a tenant.

9. The most recent date on which the alleged discrimination occurred:

May 19, 2017 , and is continuing.

10. **Types of Federal Funding Identified:**

11. **The acts alleged in this complaint, if proven, may constitute a violation of the following sections:**

804f3B, and 804a or f of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



5/25/2017

Date

NOTE: HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

RECEIVED
JUL 2017 -2 PM 8:51
DEPT. OF HOUSING & COMMUNITY DEVELOPMENT
LOS ANGELES

Housing Discrimination Complaint

Case Number: [REDACTED]

1. Complainants:

[REDACTED]

2. Complainant Representatives:

3. Other Aggrieved Parties:

4. The following is alleged to have occurred or is about to occur:

- Failure to make reasonable accommodation
- Discriminatory refusal to rent

5. The alleged violation occurred because of:

- Handicap

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

Cambridge Square Apartments
[REDACTED]

7. Respondents:

H&L Property Management
4304 Redwood Highway Ste. 200
San Rafael, CA 94903
[REDACTED]

[REDACTED]
Rifkind Law Group
100 Drakes Landing Road, Suite 260
Greenbrae, CA 94904

8. The following is a brief and concise statement of the facts regarding the alleged violation:

Complainant [REDACTED] is a disabled veteran. Respondents are H&L Management Co. (Management Company), [REDACTED] (Manager) and their attorney, [REDACTED]. Complainant alleges Respondents have refused to accommodate her disabilities.

In late September 2016, Complainant's medical provider altered her mental health medication, which on December 20, 2016 resulted in a manic episode on the property where she created noise, and someone called the police. As a result, the complainant was hospitalized. When she returned home from the hospital, she found a Three-Day Notice to Quit.

On January 5, 2017, there was an altercation between Complainant and Respondent [REDACTED] which resulted in Complainant being arrested and charged with false imprisonment (Complainant has since been admitted to a pretrial diversion program). Respondents issued Complainant a notice terminating her tenancy on January 16, 2017.

On March 5, 2017, Complainant's attorney at Sonoma County Legal Aid submitted a reasonable accommodation request asking Respondents to rescind the notice due to the aforementioned events being caused by her disability. Respondent [REDACTED] denied the request on March 20, 2017. Subsequently, Complainant submitted more detailed accommodation request to Respondent [REDACTED] on April 14, 2017. Respondent [REDACTED] denied the request, but offered to extend Complainant's tenancy until May 31, 2017. Complainant sought assistance from Fair Housing Advocates of Northern California, who explained to Respondent [REDACTED] that an extension did not meet Complainant's need, and followed up with further verification of Complainant's disabilities. This included a letter from her medical provider stating that the Complainant's medication has since stabilized, that she did not pose a threat to others, and that in his opinion, there was little likelihood the December and January events would occur again in the future. Complainant also offered to abide by a behavioral agreement. Despite intervening medical treatment to address Complainant's behavior, Respondent [REDACTED] has continued to deny Complainant's request to allow her to remain a tenant.

9. The most recent date on which the alleged discrimination occurred:

May 19, 2017 , and is continuing.

10. Types of Federal Funding Identified:

11. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:

804f3B, and 804a or f of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



5/25/2017

Date

NOTE : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

March 28, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Ocwen Financial Corporation et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at sack.keophimane@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Sack Keophimane

Sack Keophimane
Associate Governmental Program Analyst
916-585-7078
sack.keophimane@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)**ADDRESS****PHONE**

Ocwen Financial Corporation

2711 Centerville Road, Ste 400
Wilmington, DE 19808

Ocwen Loan Servicing, LLC

1661 Worthington Road, Ste 100
West Palm Beach, FL 33409

888-554-6599

AGENT FOR SERVICE**ADDRESS****PHONE**Coporation Service Company Which
Will Do Business in California - As
CSC - Lawyers Incorporation Service
(C1592199), Agent for Service for
Ocwen Loan Servicing, LLC1661 Worthington Road, Ste 100
West Palm Beach, FL 33409**PROPERTY TYPE****ADDRESS WHERE VIOLATION
OCCURRED****NO. OF UNITS**

House

[REDACTED]

1



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

March 1, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied loan

PARTICULARS

Starting from March 2017, I requested a mortgage loan modification a couple of times from the Relationship Management Department (RMD) due to financial hardship. During this time, the RMD denied my application and said I did not qualify because job loss was not a hardship. I told the RMD that I was experiencing a financial hardship because I lost my job due to a car accident and the injury affected my disability both mentally and physically. On January 1, 2018, I requested another loan modification due to my disability and financial hardship and again, my loan modification request was denied. The RMD indicated that I did not qualify based on disability even though disability and health related issues were part of the qualification criteria for a loan modification. On March 1, 2018, Ocwen stopped receiving my mortgage payment. I believe I was denied a mortgage loan modification and discriminated based on my disability.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

Mar 28, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfef.ca.gov

January 29, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Beachport Cottages Homeowners Association et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldue@dfef.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldue
Associate Governmental Program Analyst
916-585-8153
mario.anzaldue@dfef.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)**ADDRESS****PHONE**Beachport Cottages Homeowners
Association6453 Independence Ave.
Woodland Hills, California 91367

818-883-4202

Tandem Property Management Inc

1536 E. Warner Avenue, Suite A
Santa Ana, CA 92705

818-883-2402

AGENT FOR SERVICE**ADDRESS****PHONE**[REDACTED] Agent for Service for
Tandem Property Management Inc1536 E. Warner Avenue, Suite A
Santa Ana, CA 92705

818-883-2402

[REDACTED] Agent for Service for
Beachport Cottages Homeowners
Association6453 Independence Ave.
Woodland Hills, California 91367

818-883-4202

PROPERTY TYPE**ADDRESS WHERE VIOLATION
OCCURRED****NO. OF UNITS**

Condominium

[REDACTED]

30

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

July 21, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied access or services to accommodations or facilities

PARTICULARS

- a. On or around April 26, 2017, we made a reasonable accommodation request to Respondent Beach Cottages Homeowners Association and Respondent Tandem Property Management asking them to allow me to park in the guest parking space due to my disability. We provided them proof of my DMV handicap placard to support my request for a reasonable accommodation.
- b. On or around May 14, 2017, Respondent Beach Cottages Homeowners Association and Respondent Tandem Property Management denied my request to park in the guest parking space.
- c. On or around July 21, 2017, Respondent Beach Cottages Homeowners Association and Respondent Tandem Property Management conditionally approved my request, allowing me to park in the guest parking space only until September 30, 2017.
- d. On or about the beginning of September, 2017, I submitted another reasonable accommodation request for the Respondents to extend my reasonable accommodation and grant me a parking space in the guest parking lot indefinitely while I reside at the subject property. The Respondents continue to deny my reasonable accommodation request.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

{{Dte_es_:signer1:
date}}



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfef.ca.gov

April 4, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Amended Complaint

DFEH Number: [REDACTED]

HUD Number: [REDACTED]

[REDACTED] BRE Alameda/MF Property Owner LLC et al.

Dear [REDACTED]

We have amended your complaint based on the changes you requested. Please read the proposed amended complaint carefully. If you do not approve of the language on the complaint, do not sign it; instead, contact me **within ten (10) calendar days** to discuss your concerns. If you agree with the language, please sign and return the amended complaint as soon as possible. We must receive the signed complaint before it can be investigated. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldua@dfef.ca.gov or by fax to 1-888-519-5917.

Please note the information you provide is subject to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.
Thank you for your cooperation.

Sincerely,

Mario Anzaldua
Associate Governmental Program Analyst
916-585-8153
mario.anzaldua@dfef.ca.gov

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

HUD NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)**ADDRESS****PHONE**BRE Alameda/MF Property Owner
LLC222 S Riverside Plaza Suite 2000
Chicago, IL 60606

[REDACTED]

[REDACTED]

[REDACTED]

FPI Management, Inc.

800 Iron Point Rd.
Folsom, CA 95630

(916) 357-5300

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lincoln University Extensions -
Housing401 15th St.
Oakland, CA 94612

(510) 628-8010

KW Alameda, LLC

151 S. El Camino
Beverly Hills, CA 90212

(310) 887-6400

AGENT FOR SERVICE**ADDRESS****PHONE**[REDACTED] Agent for Service
for FPI Management, Inc.800 Iron Point Rd.
Folsom, CA 95630

(916) 357-5312

File Date: March 12, 2018
Amended

Page 1 of 4

**AMENDED COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

HUD NUMBER

[REDACTED]

CSC - Lawyers Incorporating
Services, Agent for Service for BRE
Alameda/MF Property Owner LLC

2710 Gateway Oaks Drive, Suite
150N
Sacramento, CA 95833

[REDACTED] Agent for Service for
Lincoln University Extensions -
Housing

401 15th Street
Oakland, CA 94612

[REDACTED] C T CORPORATION
SYSTEM), Agent for Service for KW
Alameda, LLC

818 W Seventh Street, Suite 930
Los Angeles, CA 90017

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

100



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

March 14, 2018

Via [Email]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] Park I Spectrum LLC et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Park I Spectrum LLC

ADDRESS550 Newport Center Dr.
Newport Beach, CA 92660**PHONE**The Irvine Company Apartment
Communities, Inc.550 Newport Center Dr.
Newport Beach, CA 92660

(949) 333-3020

AGENT FOR SERVICECSC - Lawyers Incorporating Service
(C1592199), Agent for Service for
Park I Spectrum LLC**ADDRESS**251 Little Falls Dr.
Wilmington, DE 19808**PHONE**CSC - Lawyers Incorporating Service
(C1592199), Agent for Service for
The Irvine Company Apartment
Communities, Inc.251 Little Falls Dr.
Wilmington, DE 19808**PROPERTY TYPE**

Apartment

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

100+



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

October 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Source of income

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

- a. On or about May 26, 2017, due to my disability (physical) and source of income (SSI), I submitted a reasonable accommodation request to leasing agent asking that I be allowed to pay rent on the 3rd Wednesday of every month. The agent collected a \$3400.00 deposit plus the first month's rent, approved my rental application and verbally accepted my reasonable accommodation request. I moved into my unit within 36 hours of having my rental application approved.
- b. On or about early-July 2017, I received a 3-day notice to pay or quit. I spoke to management regarding the reasonable accommodation request that had been in place for me to pay the 3rd Wednesday of every month. Management advised that it was not written on the lease but that they would look into it. On the 3rd Wednesday of July, I paid my rent plus the late fee and complained that the \$75 late fee was causing me hardship.
- c. On or about early-August 2017, I received a 3-day notice to pay or quit. I again spoke to management and reminded them of my reasonable accommodation request. On the 3rd Wednesday of August, I paid my rent plus the late fee and complained that the \$75 late fee was causing me hardship.
- d. On or about early-September 2017, I received a 3-day notice to pay or quit. I again spoke to management and reminded them of my reasonable accommodation request. On the 3rd Wednesday of September, I paid my rent plus the late fee and again complained that the \$75 late fee was causing me hardship.
- e. On or about October 18 2017, Management rejected my rent payment and advised that an eviction had been filed. Management would accept my rent payment only if I paid an additional \$600 for legal fees. Additionally, they requested that I provide proof of my SSI status and that I receive my SSI check on the 3rd Wednesday of each month.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

December 14, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Source of income

AS A RESULT, I WAS SUBJECTED TO

Evicted

PARTICULARS

On or about December 14, 2017, I was evicted due to my reasonable accommodation request and source of income.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

Mar 14, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1664 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 19, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]
[REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed Unruh complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldua@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldua
Associate Governmental Program Analyst
916-585-8153
mario.anzaldua@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA UNRUH CIVIL RIGHTS ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Civil Code 51, et seq

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

- Allegation -**I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE
COMPLAINANT**

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

12/5/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Sex/Gender; Sexual orientation

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

a. On or about July 2, 2017, Respondent [REDACTED] asked me to get rid of my Emotional Support Animal [ESA]. She was aware I had an ESA when I moved in.

b. On or about July 4, 2017, Respondent [REDACTED] came to my house and kicked my ESA. She again insisted I get rid of my ESA.

c. On or about July, 6, 2017, I provided my doctor's note prescribing my ESA. Respondent [REDACTED] refuses to engage with me with my reasonable accommodation request and insists she does not like dogs and to get rid of it.

d. On or about July 10, 2017, Respondent [REDACTED] called me a "punk a** f*g".



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA UNRUH CIVIL RIGHTS ACT

DFEH NUMBER

e. On or about December 5, 2017, to this day Respondent [REDACTED] refuses to address my work orders in retaliation for asking for a reasonable accommodation for my ESA. In doing so, she is hoping I move out sooner.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

Dec 20, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1664 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

March 2, 2018

Via [Email]

RE: Request to Approve Complaint

DFFH Number: [REDACTED]

[REDACTED] Reseda Park, L.P. et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Reseda Park, L.P.

ADDRESS5150 Overland Ave.
Culver City, CA 90230**PHONE**

(818) 345-2490

GK Management Co., Inc.

5150 Overland Ave.
Culver City, CA 90230

(310) 280-5084

AGENT FOR SERVICE[REDACTED] Agent for Service
for Reseda Park, L.P.**ADDRESS**5150 Overland Ave.
Culver City, CA 90230**PHONE**[REDACTED] Agent for Service
for GK Management Co., Inc.5150 Overland Ave.
Culver City, CA 90230**PROPERTY TYPE**

Apartment

**ADDRESS WHERE VIOLATION
OCCURRED**

[REDACTED]

NO. OF UNITS

100

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

November 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

a. On or about October 2016, due to my disability [physical], I submitted a reasonable modification request to management requesting that the flooring in my unit be replaced, specifically the transition strip that divides the kitchen and living area. Respondents failed to engage in an interactive process and my request went ignored. This same reasonable modification request was originally submitted and ignored in 2015, after I suffered a devastating fall caused by the faulty installation of the above-mentioned transition strip.

b. On or about November 2017, due to my disability [physical], I submitted a reasonable accommodation request to management requesting that the moldy cabinets in my unit be replaced. Respondents denied my request.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Discrimination

ON OR BEFORE

February 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Age (40 and over); Disability (physical or mental); National Origin (includes language restrictions)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

On or about February 2017, due to my disability [physical], I again submitted a reasonable modification request to management requesting that the flooring in my unit be replaced, specifically the transition strip that divides the kitchen and living area. Respondents did not immediately comply with my request and only did so when I contacted Code Enforcement about the issue. It took management approximately 25 months to address my reasonable modification request. I believe I was denied equal terms and conditions due to my National Origin [Persian], Age, and Disability.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:**DATE:**

Mar 2, 2018



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1634 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfef.ca.gov

December 21, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]
RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] The Steven W. Reiss Trust Dated May 8, 1998 et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfef.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfef.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA UNRUH CIVIL RIGHTS ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Civil Code 51, et seq

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

The Steven W. Reiss Trust Dated
May 8, 1998

ADDRESS

1574 W Alexis Ave.
Anaheim, CA 92802

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA UNRUH CIVIL RIGHTS ACT

DFEH NUMBER



- Allegation 1 -

I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE COMPLAINANT

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

1/1/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

On or about January 2017, due to my disability [mental/physical], I submitted a reasonable accommodation to Respondent Reiss requesting the mold in unit be removed because it was exacerbating my condition. On or about February 2017, a mold specialist came out and determined the mold damage was extensive and major tear out and repairs needed to be done. I was moved to a hotel, which the landlord reluctantly paid, while the mold in my unit was removed. I moved back in to my unit after the repairs were made, but I quickly noticed that the mold was not properly removed and was merely painted over. We reported this to Respondent [REDACTED] letting her know that my reasonable accommodation request was not properly addressed

- Allegation 2 -

I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE COMPLAINANT

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

8/1/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

On or about late August, 2017, I received a 60-day notice to vacate from Respondent [REDACTED] I believe this notice was in retaliation for being vocal about the mold and for requesting reasonable accommodation due to my disability.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA UNRUH CIVIL RIGHTS ACT

DFEH NUMBER

- Allegation 3 -

**I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE
COMPLAINANT**

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

9/11/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

On or about September 11, 2017, we were notified that an unlawful detainer was filed by Respondent [REDACTED]

- Allegation 4 -

**I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE
COMPLAINANT**

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

11/8/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

On or about November 8, 2017, I was evicted by Respondents [REDACTED] I believe I was ultimately evicted for being vocal about the mold issue in my unit and for requesting a reasonable accommodation.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA UNRUH CIVIL RIGHTS ACT

DFEH NUMBER

[REDACTED]

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Dec 27, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

December 22, 2017

Via [First Class Mail] [Email]
[REDACTED]

[REDACTED]

RE: **Request to Approve Complaint**

DFEH Number: [REDACTED]

[REDACTED] WP Overland Court Apartments, LP et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA UNRUH CIVIL RIGHTS ACT****DFEH NUMBER**

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Civil Code 51, et seq

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

WP Overland Court Apartments, LP

ADDRESS310 N Westlake Blvd. #210
Westlake Village, CA 91362**PHONE**

[REDACTED]

[REDACTED]

[REDACTED]

Buckingham Property Management

2170 N Winery Ave.
Fresno, CA 93703

(559) 452-8250

AGENT FOR SERVICE[REDACTED] Agent for Service for
WP Overland Court Apartments, LP**ADDRESS**310 N Westlake Blvd. #210
Westlake Village, CA 91362**PHONE**[REDACTED] Agent for Service
for Buckingham Property
Management2170 N Winery Ave.
Fresno, CA 93703



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA UNRUH CIVIL RIGHTS ACT

DFEH NUMBER



- Allegation -

**I ALLEGE THAT THE RESPONDENT TOOK THE FOLLOWING ADVERSE ACTIONS AGAINST THE
COMPLAINANT**

Complainant was denied full and equal accommodations, advantages, facilities, privileges, or services by a business establishment of one or more Fair Employment and Housing Act (which incorporates Civil Code 51) protected basis.

ON OR BEFORE

7/17/2017 12:00:00 AM

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied Full or Equal Accommodations, Advantages, Facilities, Privileges, or Services by a Business Establishment – Including both Private and Public Entities

PARTICULARS

On or about July 17, 2017, I was denied rental due of my Emotional Support Animal [ESA]. Although I had all the proper documentation for my ESA, property manager Respondent [REDACTED] failed to engage in an interactive process and stated that under no circumstances were pets allowed. I went through a lengthy application process, including an interview on or about May 17, 2017, where there had been no mention of pets not being allowed.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

Dec 28, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1664 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfef.ca.gov

March 30, 2018

Via Email

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Williams Family Trust et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfef.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfef.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Williams Family Trust

ADDRESS

6520 Platt Ave. #253
West Hills, CA 91307

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

8

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

January 5, 2018

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

I was discriminated against and denied equal terms and conditions at the subject property [REDACTED]. The subject property is an 8 unit apartment building owned by the Williams Family Trust and managed by trustee, [REDACTED] and onsite manager, [REDACTED].

On or about December 31, 2017, the day before I was to move in, I was informed I was being denied rental of unit due to my Emotional Support Animal (ESA).

On or about January 5, 2018, after further discussions with management, I was allowed to move in with the condition that my monthly rent would go up from approximately \$2245.00 to \$2390.00 because of the my ESA. Prior to signing, the lease verbiage was revised to replace all mentions of "pet" with "service dog".

I believe I was discriminated against and denied equal terms and conditions because of my need for an ESA and as a result, my monthly rent went up.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

[REDACTED]

DATE:

Apr 4, 2018



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

April 12, 2018

Via Email



RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] Shaun-T/CIP Fair Oaks, LLC et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at carla.rubalcava@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Carla Rubalcava

Carla Rubalcava
Associate Governmental Program Analyst
(916) 585-8143
carla.rubalcava@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

Shaun-T/CIP Fair Oaks, LLC

ADDRESS

30012 Ivy Glenn Drive, Ste. 200
Laguna Niguel, CA 92677

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for
Service for Shaun-T/CIP Fair Oaks,
LLC

ADDRESS

30012 Ivy Glenn Dr., Ste. 200
Laguna Niguel, CA 92677

PHONE

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

95+



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 12, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory statements/advertisement

PARTICULARS

I, [REDACTED] was discriminated against and subjected to discriminatory statements at [REDACTED] due to my mental disability. The Respondents are owner, Shaun-T/CIP Fair Oaks, LLC and onsite property manager, [REDACTED]

On or about November 12, 2017, I experienced a mental health crisis, as a result of my mental disability, and sought Respondent [REDACTED] for help. Instead of coming to my aid, Respondent [REDACTED] made a video recording of my mental state and called me crazy, weird, and stupid. The police were called and I was taken to the psychiatric ward.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Association with someone of a protected class

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

We were discriminated against and denied equal terms and conditions at [REDACTED] due to [REDACTED] mental disability. The Respondents are owner, Shaun-T/CIP Fair Oaks, LLC and onsite property manager, [REDACTED]

On or about November 15, 2017, only days after [REDACTED] mental health crisis, management issued us an incurable three-day notice to vacate.

On or about November 15 through 30, 2017, we received harassing text messages from Respondent [REDACTED] with statements such as, but not limited to, "we don't want you here" and "your time is up". Additionally, Respondent [REDACTED] would seek us out at the property to confront us and to force us to leave.

On or about November 30, 2017, we decided to vacate the subject property due to the ongoing harassment and discrimination from Respondent [REDACTED]

We believe we were discriminated against and asked to vacate due to [REDACTED] mental disability and her mental health crisis that occurred on November 12, 2017.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Harassment

ON OR BEFORE

November 30, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental); Association with someone of a protected class

AS A RESULT, I WAS SUBJECTED TO

A hostile living environment

PARTICULARS

We were harassed against and subjected to a hostile living environment at [REDACTED] due to [REDACTED] mental disability. The Respondents are owner, Shaun-T/CIP Fair Oaks, LLC and onsite property manager, [REDACTED]

On or about November 15, 2017, only days after [REDACTED] mental health crisis, management issued us an incurable three-day notice to vacate.

On or about November 15 through 30, 2017, we received harassing text messages from Respondent [REDACTED] with statements such as, but not limited to, "we don't want you here" and "your time is up". Additionally, Respondent [REDACTED] would seek us out at the property to confront us and to force us to leave.

On or about November 30, 2017, we decided to vacate the subject property due to the ongoing harassment and discrimination from Respondent [REDACTED]

We believe we were harassed and subjected to a hostile living environment due to [REDACTED] mental disability and her mental health crisis that occurred on November 12, 2017.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANTS OR COMPLAINANTS' LEGAL REPRESENTATIVE:**DATE:**

[REDACTED]

Apr 16, 2018

Apr 16, 2018

Housing Discrimination Complaint

Case Number: [REDACTED]

DFEH Matter [REDACTED]

Date Filed: February 8, 2018

1. **Complainants:**

[REDACTED]

2. **Complainant Representatives:**

3. **Other Aggrieved Parties:**

4. **The following is alleged to have occurred or is about to occur:**

- Discriminatory terms, conditions, privileges, or services and facilities
- Failure to make reasonable accommodation

5. **The alleged violation occurred because of:**

- Handicap

6. **Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):**

[REDACTED]

7. **Respondents:**

[REDACTED]

Village in the Park Homeowners' Association
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

RECEIVED

FEB 15 2018

**Department of Fair Employment & Housing
Elk Grove**

Village in the Park Homeowners' Association
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

DNJ Property Management Services, Inc. DBA Common Interest Management
Services
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

[REDACTED]
DNJ Property Management Services, Inc. DBA Common Interest Management
Services
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

8. The following is a brief and concise statement of the facts regarding the alleged violation:

Complainant is [REDACTED] Complainant is a disabled person as defined by the federal Fair Housing Act. Respondents are DNJ Property Management Services, Inc. DBA Common Interest Management Services (HOA management company), [REDACTED] (HOA management agent), Village in the Park Homeowners' Association (HOA), and [REDACTED] (HOA President).

Complainant's disability makes her sensitive to chemicals, including the fumes from most paints. Exposure to paint fumes results in Complainant experiencing a severe rash, respiratory problems, nausea, digestive problems, and puts her at risk of death.

In 2012, the Complainant requested, and the Respondent HOA accommodated, Complainant's request for a reasonable accommodation to have her unit painted using a specific paint called Mystic, which does not exacerbate Complainant's disabilities. In or around November 2017, Complainant learned that all of the units within the HOA would again be painted. Complainant then sent Respondents a request for a reasonable accommodation to again have the interior of her unit painted using Mystic, and she additionally requested that her front door not be painted because it would take months for the fumes to dissipate from the door, and the exposure to the fumes would exacerbate her disability. Shortly after the letter was sent, [REDACTED] encountered Complainant while she was in her garage. [REDACTED] asked to speak to Complainant in the street with other individuals from the management company. Complainant asked about her request to use the special paint, and mentioned that she had several cans of leftover paint from the last painting in 2012 that might be useable if

they wanted it. [REDACTED] informed her that he was aware of her request, but did not want to discuss it. Complainant asked to have a sit-down meeting with the HOA Board regarding the issue, but [REDACTED] denied the request.

On January 22, 2018, Respondents posted a notice on Complainant's unit stating that she was forbidden from speaking to any of the workers, including painters. Respondents have not stated when Complainant's unit will be painted, but Complainant learned on January 31, 2018 that painting work has begun on the homes near her property. To date, Respondents have not responded to Complainant's request for an accommodation.

9. **The most recent date on which the alleged discrimination occurred:**

January 22, 2018 , and is continuing.

10. **Types of Federal Funding Identified:**

11. **The acts alleged in this complaint, if proven, may constitute a violation of the following sections:**

804b or f, and 804f3B of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



2-2-18

Date

N O T E : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

RECEIVED

FEB 08 2018

Dept. of Fair Employment & Housing

Los Angeles Regional Office

Housing Discrimination Complaint

Case Number: [REDACTED]

1. Complainants:

[REDACTED]

2. Complainant Representatives:

3. Other Aggrieved Parties:

4. The following is alleged to have occurred or is about to occur:

- Discriminatory terms, conditions, privileges, or services and facilities
- Failure to make reasonable accommodation

5. The alleged violation occurred because of:

- Handicap

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

[REDACTED]

7. Respondents:

[REDACTED]

Village in the Park Homeowners' Association
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

Village in the Park Homeowners' Association
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

DNJ Property Management Services, Inc. DBA Common Interest Management
Services
c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
Danville, CA 94526

[REDACTED]
DNJ Property Management Services, Inc. DBA Common Interest Management
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c/o [REDACTED] Agent for Service of Process
315 Diablo Rd Ste 221
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they wanted it. [REDACTED] informed her that he was aware of her request, but did not want to discuss it. Complainant asked to have a sit-down meeting with the HOA Board regarding the issue, but [REDACTED] denied the request.

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9. The most recent date on which the alleged discrimination occurred:

January 22, 2018 , and is continuing.

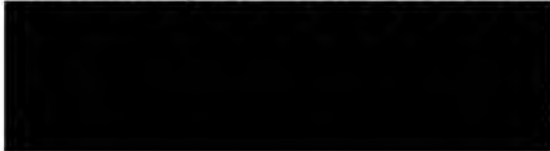
10. Types of Federal Funding Identified:

11. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:

804b or f, and 804f3B of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



2-2-18

Date

N O T E : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR KEVIN KISH

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfef.ca.gov

December 28, 2017

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

[REDACTED] The Giers Family Associates LLC et al.

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldue@dfef.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldue
Associate Governmental Program Analyst
916-585-8153
mario.anzaldue@dfef.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

The Giers Family Associates LLC

ADDRESS

156 Hall Dr.
Orinda, CA 94563

PHONE

Satellite Management Co

1010 East Chestnut Ave.
Santa Ana, CA 92701

(714) 558-2411

[REDACTED]

[REDACTED]

[REDACTED]

AGENT FOR SERVICE

[REDACTED] Agent for
Service for Satellite Management Co

ADDRESS

1010 East Chestnut Ave.
Santa Ana, CA 92701

PHONE

(714) 558-2411

[REDACTED] Agent for Service
for The Giers Family Associates LLC156 Hall Dr.
Orinda, CA 94563

PROPERTY TYPE

Apartment

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

78



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

[REDACTED]

- Allegation -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

September 1, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

- a. On or about July 7 2017, while signing my new lease, I asked Respondent [REDACTED] for a reasonable accommodation. I needed a shade on my balcony because of my disability [Physical]. Respondent [REDACTED] told me to not even bother submitting an accommodation request since it would be automatically denied.
- b. On or about August 14, 2017, I submitted my reasonable accommodation request in writing along with my doctor's note since my symptoms had exacerbated. My request went unanswered; Respondent [REDACTED] refused to engage with me in my reasonable accommodation request.
- c. On or about mid September, 2017, I submitted another reasonable accommodation request for the rules and policies to be changed to allow for my reasonable accommodation to be granted. Again, Respondent [REDACTED] refused to engage with me in my reasonable accommodation request.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:

DATE:

[REDACTED]

Dec 28, 2017



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

November 3, 2017

Via email: [REDACTED]

RE: **Request to Approve Complaint**

DFEH Matter Number: [REDACTED]

[REDACTED] Housing Authority Of The City Of Los Angeles (HACLA)

Dear [REDACTED]

This notice confirms that you have filed an inquiry and have been interviewed by a Department of Fair Employment and Housing (DFEH) representative. You must approve, sign and return the complaint before it can be investigated. If you do not approve the language on the complaint, please do not sign the complaint; instead, contact me to discuss your concerns. **If you do not return the signed complaint within 10 days, your inquiry will be closed and no further action will be taken.**

Please return the signed complaint by mail to DFEH, 2218 Kausen Dr. Suite 100 Elk Grove, CA 95758 or by email to the email address below or by fax to 888-519-5917.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldúa
Associate Governmental Program Analyst
916-585-8153
mario.anzaldua@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Unruh Civil Rights Act
(Civ. Code, § 51)**

Complaint of

DFEH No. [REDACTED]

[REDACTED] Complainant.
[REDACTED]

[REDACTED] Co-Complainant.
[REDACTED]

vs.

Housing Authority Of The City Of Los Angeles
(HACLA), Respondent.
2600 Wilshire Blvd.
Los Angeles, CA 90057

[REDACTED] Co-Respondent

Housing Authority Of The City Of Los Angeles
(HACLA)
2600 Wilshire Blvd.
Los Angeles, CA 90057

[REDACTED] Co-Respondent

Housing Authority Of The City Of Los Angeles
(HACLA)
2600 Wilshire Blvd.
Los Angeles, CA 90057

THE PARTICULARS ARE:

1. [REDACTED] alleges that respondent took the following adverse actions against complainant. Complainant was denied full or equal

accommodations, advantages, facilities, privileges, or services by a business establishment, including both private and public entities because of one or more Fair Employment and Housing Act (which incorporates Civil Code section 51) protected basis: **Disability - [physical or mental]** .

2. My belief is based on the following:

a. On or about January 4, 2017, I requested a reasonable accommodation for a 3 bedroom dwelling to accommodate for our live-in aid to Respondents [REDACTED] and [REDACTED]. The Respondents refused to engage with me in the reasonable accommodation interactive process. They have refused to answer to my calls and emails; to this day I still do not have an answer to my request.

3. Complainants [REDACTED] reside in the City of [REDACTED] State of California.

VERIFICATION

I, [REDACTED] am the **Complainant** in the above complaint. I have read the above complaint and know its contents. I declare under penalty of perjury under the laws of the State of California that the above is true and correct of my own knowledge, except as to those matters alleged on information and belief, which I also believe to be true.

Signature of Complainant or Complainant's Legal Representative:

Date:

Dec 18, 2017

Signature of Complainant or Complainant's Legal Representative:

Date:

Dec 18, 2017



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1884 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

February 2, 2018

Via [First Class Mail] [Email]

RE: Request to Approve Complaint

DFEH Number: [REDACTED]

Dear [REDACTED]

The enclosed draft complaint is the result of your interview with me. Please read the proposed complaint carefully. If you agree with the language, please sign and return the complaint via mail, email or fax. If you do not approve of the language on the complaint, do not sign it; instead, contact me to discuss your concerns. My mailing address is:

Department of Fair Employment and Housing
2218 Kausen Dr. Suite 100
Elk Grove, CA 95758

You may also return the complaint to me by email at mario.anzaldua@dfeh.ca.gov or by fax to 1-888-519-5917.

Please return the signed complaint or contact me with your concerns as soon as possible as we cannot begin our investigation until we have received your signed complaint. The law requires that a complaint be filed within one (1) year from the date of the discriminatory act.

If you do not return the signed complaint or contact me **within ten (10) calendar days** from the date of this letter, your case will be closed.

Please note that the information you provided is subjected to the Department's privacy policy and the California Public Records Act, Government Code section 6250 et seq.

Thank you for your cooperation.

Sincerely,

Mario Anzaldua
Associate Governmental Program Analyst
916-585-8153
mario.anzaldua@dfeh.ca.gov

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

DFEH NUMBER

[REDACTED]

COMPLAINANT

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

TYPE OF DISCRIMINATION AND LAW

Government Code § 12955

Civil Code § 51, et seq.

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT(S)

[REDACTED]

ADDRESS

[REDACTED]

PHONE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROPERTY TYPE

Other

ADDRESS WHERE VIOLATION
OCCURRED

[REDACTED]

NO. OF UNITS

11

- Allegation 1 -

I ALLEGE THAT I EXPERIENCED

Harassment

ON OR BEFORE

March 8, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

PARTICULARS

a. On or about March 6, 2017, I requested a reasonable accommodation for my emotional support animal [ESA]. Respondents [REDACTED] mocked my request to my face. Respondent [REDACTED] insinuated I was lying. She brought up her background as an investigator, and she stated that she knew when people were lying. She said anyone could get an ESA these days, including her.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER

b. On or about March 8, 2017, I received a long email from the Respondents with ESA definitions and threats of what could legally happen to someone who is lying or submitting false requests.

- Allegation 2 -

I ALLEGE THAT I EXPERIENCED

Discrimination

ON OR BEFORE

March 10, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical or mental)

AS A RESULT, I WAS SUBJECTED TO

Denied reasonable accommodation for a disability or medical condition

PARTICULARS

a. On or about March 10, 2017, my doctor submitted my ESA recommendation letter directly to the Respondents. The Respondents denied my reasonable accommodation based on the letter not meeting their requirements. Later that day, my doctor resent the letter with their requirements. I also sent the letter via certified mail. The Respondents failed to engage with me in the interactive process to my reasonable accommodation requests.

- Allegation 3 -

I ALLEGE THAT I EXPERIENCED

Retaliation

ON OR BEFORE

October 23, 2017

BECAUSE OF MY ACTUAL OR PERCEIVED

Requested or used a disability-related accommodation

AS A RESULT, I WAS SUBJECTED TO

Denied equal terms and conditions

PARTICULARS

a. On or about the first week of October 23, 2017, in retaliation for requesting and having my ESA, I received a very restrictive and different lease from what I had originally signed and what other tenants were receiving.

b. On or about November, 5, 2017, I responded to management in regards to the differing terms. I was eventually provided the standard lease I originally signed.



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH NUMBER



SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL REPRESENTATIVE:



DATE:

Feb 2, 2018